

October 1<sup>st</sup>, 2016

**SUBMITTED ELECTRONICALLY VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW Washington, DC 20554

FCC Docket 02-6

Re: Appeal of Grove Public Schools (BEN: 140323), for denial of FY 2014  
Application 951256 FRN 2586885

Pursuant to 47 C.F.R. § 54.719(a), Grove hereby respectfully submits this appeal of decisions by the Universal Service Administrative Company (USAC) to deny FRN 2586885 for Funding Year 2014.

Contact:

Chris Webber  
CRW Consulting  
P.O. Box 701713  
Tulsa, OK 74170-1713  
[chris@crwconsulting.com](mailto:chris@crwconsulting.com)  
918.445.0048  
Consultant for Grove

The reason for denial:

*“The FRN is denied because you did not select the most cost-effective bid proposal. FCC rules state that in selecting a provider of eligible services, applicants must carefully consider all bids submitted and must select the most cost-effective service offering. The FCC codified in the Ysleta Order, that in evaluating bids from prospective service providers, applicants must select the most cost-effective offering from the bids received. The selected bid must itself be cost-effective compared to the prices available commercially and stated that ‘there may be situations where the price of services is so exorbitant that it cannot, on its face, be cost-effective. For instance, a proposal to sell at prices two to three times greater than the prices available from commercial vendors would not be cost effective, absent extenuating circumstances.’”*

Signed:

\_\_\_\_\_/s/

Chris Webber  
Owner  
CRW Consulting LLC  
PO Box 701713  
Tulsa, OK 74170  
918.445.0048  
chris@crwconsulting.com

## **I. INTRODUCTION**

Grove Public Schools (Grove or the District) hereby respectfully requests that the Universal Service Administrative Company (USAC) reverse its decision to deny Schools and Libraries (E-rate) universal service funding to Grove for its FRN 2586885 on 471 Application Number 951256 for Funding Year 2014.

USAC denied the District's request for funding because USAC claims that the District did not select the most cost-effective bidder to provide its Internet access services. To the contrary, as the discussion below will explain, the District satisfied all of the program's competitive bidding rules and selected the most cost-effective services, when it considered price and its other evaluation criteria. USAC's use of a bright-line standard is contrary to Commission precedent stating no such bright-line test exists, and, regardless, *Ysleta* is not applicable here.

Upholding the denials of these applications will preclude a fair and open competitive bidding process in which all bids are fairly evaluated, render the competitive bidding process meaningless and will force schools to select a lower-cost bid, even if not the most cost-effective, contrary to program rules – and possibly their own competitive bidding requirements. For practical purposes, this ruling by USAC will make price the only factor that matters in the E-rate competitive bidding process. That will result in many applicants selecting services that do not provide the best value for them or, therefore, the E-rate program. Such an outcome would not serve the E-rate program or statutory goals. Thus, we respectfully ask USAC to reverse its decision and grant funding to the District for the funding request at issue.

## II. BACKGROUND

Grove is a small, school district in northeastern Oklahoma. The District has approximately 500 students enrolled. The District does not have a full time IT person on staff.<sup>1</sup>

For Funding Year 2014 the District filed a 470 requesting bids for Internet access and other unrelated services.<sup>2</sup> The District also released an Invitation for Competitive Bids (IFCB – also known as a Request for Proposal or RFP) on November 6<sup>th</sup>, 2013.<sup>3</sup> Included in this RFP were requests for Internet access and other unrelated services.

The District received four bids for the Internet access portion of the RFP: Meet Point Networks, AT&T, XO and OneNet.<sup>4</sup> After carefully evaluating the bids received, the District selected Meet Point Networks to provide their Internet access under a multi-year contract.<sup>5</sup>

On May 20<sup>th</sup>, 2016 USAC issued a Notification of Commitment Adjustment Letter that denied the funding request for Meet Point services on FRN 2586885.<sup>6</sup> The reason for the denial states:

*“The FRN is denied because you did not select the most cost-effective bid proposal. FCC rules state that in selecting a provider of eligible services, applicants must carefully consider all bids submitted and must select the most cost-effective service offering. The FCC codified in the Ysleta Order, that in evaluating bids from prospective service providers, applicants must select the most cost-effective offering from the bids received. The selected bid must itself be cost-effective compared to the prices available commercially and stated that ‘there may be situations where the price of services is so exorbitant that it cannot, on its face, be cost-effective. For instance, a proposal to sell at prices two to three times greater than the prices available from commercial vendors would not be cost effective, absent extenuating circumstances.’”*

---

<sup>1</sup> Affidavit of Rusty Carmichael, paragraph 5

<sup>2</sup> FCC Form 470 # 248700001161457 (FY 2014 Form 470).

<sup>3</sup> FY 2014 RFP, Exhibit 1.

<sup>4</sup> See Exhibit 2, Bids Received

<sup>5</sup> FCC Form 471 # 951256, Exhibit 3. The services also include 24 x 7 troubleshooting and repair, onsite visits to restore Internet access, firewall services, and email and web hosting.

<sup>6</sup> Exhibit 4, Notification of Commitment Adjustment Letter, dated 5/20/2016.

Grove received USAC Appeal Denial Letter for 2014 on August 5, 2016 .<sup>7</sup>

By this letter, the District appeals USAC's decision to rescind its funding commitments. Commission rules allow 60 days for the filing of an appeal to the FCC.<sup>8</sup> Because this appeal is filed within 60 days of USAC's decision, it is timely filed.

### **III. BECAUSE GROVE SELECTED THE MOST COST-EFFECTIVE SERVICES, ITS E-RATE APPLICATION FOR FY 2014 SHOULD BE RE-INSTATED**

Federal Communications Commission rules require applicants to seek competitive bids for all services and equipment eligible for E-rate discounts.<sup>9</sup> Applicants are required to “carefully consider all bids submitted” and to select “the most cost-effective service offering” using the price of eligible goods and services as the primary factor.<sup>10</sup> Under section 54.511(a) of the Commission's rules, an applicant “may consider relevant factors other than the pre-discount prices” submitted by providers to determine which service offering is the most cost-effective, so long as price is the primary factor considered.<sup>11</sup>

The Commission's *Tennessee Order* ruled there is a presumption of cost-effectiveness when the applicant meets all of the requirements of the competitive bidding process and when the applicant pays its share of the costs.<sup>12</sup> Nevertheless, USAC alleges that the District did not select the most cost-effective service offering. USAC claims that the District's selection of

---

<sup>7</sup> Administrator's Decision Letters for 2015, 2014 and 2013, Exhibit 5.

<sup>8</sup> 47 C.F.R. § 54.719(a); 47 C.F.R. § 54.720(b).

<sup>9</sup> See 47 C.F.R. § 54.503(a)-(b) (2014). See also *In the Matter of Fed.-State Joint Bd. on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 97-157 at ¶ 480 (1997) (*First Universal Service Order*) (finding that “fiscal responsibility compels us to require that eligible schools and libraries seek competitive bids for all services eligible for [E-rate] discounts.”).

<sup>10</sup> *Id.* at § 54.511(a) (2012) and (2014). See also 47 C.F.R. §§ 54.503(c)(2)(vii), 54.504(a)(1)(xi) (2012) (requiring applicants to certify on FCC Forms 470 and 471 respectively that the most cost-effective bid will be or was selected).

<sup>11</sup> 47 C.F.R. § 54.511(a).

<sup>12</sup> *Tennessee Order* at ¶¶ 9-12 .

services that cost more than two times another bid violates the Commission's directive in *Ysleta*.<sup>13</sup> The "standard" used by USAC, however, has never been adopted by the Commission as a bright-line standard for cost-effectiveness. USAC is also applying this standard to compare bids that provide different service components (that are eligible). Further, the dicta in *Ysleta* is not applicable to this case.

**A. Grove Followed E-rate Competitive Bidding Rules to Select the Most Cost-Effective Bid, Contrary to USAC's Allegations.**

In the *Universal Service Order* establishing the E-rate program, the Commission agreed with the recommendation of the Federal-State Joint Board on Universal Service that schools and libraries should not be required to choose the lowest-priced service but instead should be allowed the "'maximum flexibility' to take service quality into account and to choose the offering or offerings that meets their needs 'most effectively and efficiently.'"<sup>14</sup> In the *Second Report and Order*, the Commission codified the requirement that price must be the primary factor when applicants analyze bids they have received.<sup>15</sup>

---

<sup>13</sup> See Funding Commitment Decision Letter; *Request for Review of the Decision of the Universal Service Administrator by Ysleta Independent School District El Paso, Texas, et al.*, Order, FCC 03-313, 18 FCC Rcd 26407, n. 138 (2003) (*Ysleta Order*).

<sup>14</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, at ¶ 481 (1997) (*Universal Service Order*) (quoting the Joint Board's recommendation).

<sup>15</sup> See *Schools and Libraries Universal Support Mechanism*, CC Docket No. 02-6, Second Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 9202, FCC 03-101 (2003) (codifying 47 C.F.R. § 54.511(a)) (*Second Report and Order*); see also *School and Libraries Universal Support Mechanism*, CC Docket No. 02-6, Fifth Report and Order and Order, 19 FCC Rcd 15808 (2004) (codifying 47 C.F.R. § 54.504(b)(2)(vii) and 47 C.F.R. § 54.504(c)(1)(xi)) (*Fifth Report and Order*).

Significantly, the Commission's rules have never required schools and libraries to select a provider offering a lower price, even among bids for comparable service.<sup>16</sup> Given that price, as a category, only has to be weighted one point higher than any other category,<sup>17</sup> however, it is quite likely that a vendor could be awarded fewer points in the cost category yet still win the bid based on points earned in the technical (non-price) categories. In fact, the Commission has stated repeatedly that price cannot be the only factor for the obvious reason that "price cannot be properly evaluated without consideration of what is being offered."<sup>18</sup>

The District met the Commission's requirements by giving more weight to price than to any other factor it used in the selection process and by appropriately awarding points in the other non-cost factors. The bid evaluation sheets used by the District allotted a maximum of 40 points for the price of eligible goods and services.<sup>19</sup> The other category – service history - had maximum points of 20.<sup>20</sup>

Grove considered the quality of service, as the Commission explicitly recognized in *Tennessee*, and selected the bid that met its needs "most effectively and efficiently."<sup>21</sup> To meet the needs of its students and teachers, Grove required an Internet access service that provided strong network security.<sup>22</sup> Meet Point received higher scores because of their excellent service

---

<sup>16</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 9029, para. 481 (1997) (subsequent history omitted) (*Universal Service Order*). See also *Tennessee Order* at ¶ 9 ("Even among bids for comparable services, however, this does not mean that the lowest bid must be selected.").

<sup>17</sup> If, for example, a school assigns 10 points to reputation and 10 points to past experience, the school would be required to assign at least 11 points to price. See *Ysleta Order* at ¶ 50, n. 138.

<sup>18</sup> *Tennessee Order* at ¶ 8.

<sup>19</sup> Bid Evaluation Sheets, Exhibit 6.

<sup>20</sup> *Id.*

<sup>21</sup> *Tennessee Order* at ¶ 9

<sup>22</sup> Carmichael Aff. ¶ 9(iv)

history with the District and Meet Point offered services that neither AT&T nor OneNet included on their bid – specifically firewall services.<sup>23</sup> Additionally, Meet Point received additional points for their direct line of communication – when issues arose with Meet Point the school had the cell phone numbers for the principals in the company. These services and the direct line of communication are especially important to a school district that had no full time IT staff. It was not beneficial for the district to have a service that required a lot of staff time in the restoration process. When the Internet is down, the teacher cannot skip a lesson or wait until next week when the Internet is working again. Every minute of classroom time is valuable, especially with the demands upon the education system today. Similarly, online testing cannot be pushed to a different time. Therefore, service quality (and the ability to quickly restore that service) is an essential component of the selection process.

Meet Point received higher scores in the non-price categories based upon the District’s direct experience with the people that ran Meet Point in previous funding years – the school described this as a “great working relationship.”<sup>24</sup> The staff at Meet Point had been responsible for initiation of the Internet services; configuration of the router; determining the cause of any issues with the services and resolving those issues; and the configuration, administration and issue-resolution of email services. Their work ethic demonstrated a commitment to providing the best services for the District. Mr. Carmichael states: “I have never experienced a time when calling (Meet Point) for technical support/help that my call wasn’t answered immediately.”<sup>25</sup> As the Commission has noted, “[A] school should have the flexibility to select different levels of services, to the extent such flexibility is consistent with that school’s technology plan and ability

---

<sup>23</sup> See Exhibit 2, Bids Received

<sup>24</sup> Carmichael Aff. ¶ 14

<sup>25</sup> *Id.*



to pay for such services.”<sup>26</sup> The quality of service and responsiveness when problems arise are especially important to small districts that have no full time IT person on staff.

In contrast, OneNet received lower point awards in the non-price categories. Specifically, Grove had heard from multiple OneNet customers that OneNet’s tech support was not up to par. The District had also heard that “OneNet refused to assist customers when service was lost and frequently blamed the loss on the customer until after much complaining the problem would be found to be on OneNet’s end. The District had also heard that OneNet was “oversubscribed” and that those customers were not getting the bandwidth they had ordered.”<sup>27</sup> The District notes: “While attending conferences and workshops I heard stories from other technology persons that they were not getting the bandwidth from OneNet that they were promised, some stating that they were only getting about half the bandwidth they were expecting.”<sup>28</sup> What is the point of going with a lower-priced provider if you don’t get what you are paying for?

In fact, in 2011 OneNet sponsored a K12 conference in Oklahoma: *NetPotential 2011*. During this conference, Von Royal, the Executive Director and CIO of OneNet admitted they had problems with their network, and that they were “not pleased with all the levels of service we were providing, so we undertook a major upgrade.”<sup>29</sup> For several years OneNet was oversubscribed (meaning you could order a 100 Mb circuit and only get a portion of that bandwidth) – as Wes Fryer, a respected K12 technology advocate in Oklahoma, writes: “OneNet

---

<sup>26</sup> *Tennessee*, Para. 9

<sup>27</sup> Carmichael Aff. ¶ 14

<sup>28</sup> Carmichael Aff. ¶ 14

<sup>29</sup> *Moving at the Speed of Creativity* October 21, 2011, <http://www.speedofcreativity.org/2011/10/21/netpotential-2011-conference-notes-netpotential11/>

has historically over-subscribed its k-12 educational network when it comes to bandwidth.<sup>30</sup>

OneNet themselves admitted that their network had not been performing to the standards they would have liked. This was common knowledge in the Oklahoma K12 community at the time.

Grove also had experience with AT&T's Internet service in the past (Funding Year 2011). AT&T received fewer points than Meet Point because of their past poor performance with the district. The District notes that "the District has experienced difficulty contacting, scheduling and working with the company in the past. This is especially important for a district that has no full time IT person on staff.

Meet Point offered services not offered by the other providers, onsite visits to restore Internet access, and firewall services.<sup>31</sup> As noted by the Commission, applicants cannot properly consider price without consideration of what services are being offered. Here, Meet Point offered additional services that neither OneNet nor AT&T did not include in their bid proposal.

Grove evaluated the Internet access providers based on categories that it determined were important. That evaluation led Grove to select the service provider with the offer that best met the District's needs. It chose Meet Point because it determined that the service history, of Meet Point was outstanding and the company's understanding of the District's needs were superior to that of OneNet and AT&T – as allowed and encouraged by Commission orders and E-rate program rules.

---

<sup>30</sup> *Moving at the Speed of Creativity*, March 22, 2011, <http://www.speedofcreativity.org/2011/03/22/iphone-tethering-cellular-bandwidth-consumption-the-home-school-internet-access-divide/>

<sup>31</sup> See Exhibit 2, Bids Received

## **B. The Commission Has Never Established a Bright-Line Standard, as USAC Has Done Here.**

After adopting the guidance on cost-effectiveness in *Tennessee*, the Commission declined to adopt a bright-line standard for cost-effectiveness. In the *Third Report and Order* – released two weeks after *Ysleta* – and in a paragraph directly referencing *Ysleta*, the Commission specifically noted it did not have a bright-line test for cost-effectiveness: “Nor do our rules expressly establish a bright line test for what is a ‘cost effective’ service.”<sup>32</sup> The Commission has twice sought comment on whether to adopt specific standards or provide additional guidance with respect to this rule, but has so far declined to do so.<sup>33</sup>

Contrary to these Commission declarations, however, USAC points to *Ysleta* as support for stating that Grove’s services are not cost-effective, by stating that the services selected through Grove’s competitive bidding process were more than two times the OneNet and AT&T

---

<sup>32</sup> See, e.g., *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Third Report and Order and Second Further Notice of Proposed Rulemaking, FCC 03-323, at ¶ 87 (*Third Report and Order*) (“Our rules do not expressly require, however, that the applicant consider whether a particular package of services are the most cost effective means of meeting its technology needs. Nor do our rules expressly establish a bright line test for what is a “cost effective” service.”); *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Notice of Proposed Rulemaking, FCC 13-100, at ¶ 213 (*Modernization NPRM*) (“[W]e seek to refresh the record on whether we should adopt bright line tests, benchmark or formula for determining the most cost-effective means of meeting an applicant’s technology needs.”). It is notable, however, that the Commission appeared to focus on situations where no bid or only one bid was received, and those situations where applicants are selected expensive priority one services simply because they are supported, even though they are unnecessary or when less expensive services would fill the same need. *Modernization NPRM* at ¶¶ 203, 212-213.

<sup>33</sup> In 2003, in the *Third Report and Order*, the Commission sought comment on whether it should codify additional rules to ensure that applicants make informed and reasonable decisions in deciding for which services they will seek discounts. *Third Report and Order*, at ¶ 87. In the *Modernization NPRM*, the FCC sought comment on adopting new standards for cost-effectiveness. *Modernization Order*, at ¶¶ 211-216. In the *First Modernization Order*, the Commission provided limited guidance related to the showing of cost-effectiveness necessary to receive funding for data plans for wireless devices and wireless air cards providing Internet access. The Commission ruled the wireless services are not cost-effective if they are duplicating service already being provided. *Id.* at ¶ 151.

bid. There are several problems with USAC's reliance upon *Ysleta* here. First, USAC appears to be establishing a bright-line rule even though the Commission has expressly stated that it has not adopted a bright-line standard.<sup>34</sup> As USAC is aware, USAC cannot interpret Commission rules.<sup>35</sup> As such, USAC should not use a bright-line standard of "two times" other bids to determine that services selected through Grove's competitive bidding process are not cost-effective. Further, the Commission directed USAC to review its approach to cost-effectiveness reviews and then share the information with applicants and services providers before it attempts to implement a new approach, with oversight performed by the Wireline Competition Bureau and the Office of the Managing Director.<sup>36</sup> As of the date of filing this appeal, USAC has not provided this information. It is a potential violation of the Administrative Procedure Act and, at a minimum, fundamentally unfair to applicants to adopt a new standard of review and simply not tell the applicants what the standard is before holding them to it. In fact, the Commission should seek comment in a rulemaking process to establish a new standard, as it has done twice before without adopting such a standard. As the Commission has recognized by seeking comment on this issue, the Commission should adopt an order revising its own precedent if it desires to do so.<sup>37</sup>

Second, *Ysleta*'s facts are not applicable to this situation. The Commission in *Ysleta* analyzed a competitive bidding process in which the school district received one or no bids.<sup>38</sup>

---

<sup>34</sup> See *Third Report and Order* at ¶ 87; *Modernization NPRM* at ¶ 213.

<sup>35</sup> 47 C.F.R. § 54.702(c).

<sup>36</sup> *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, *Connect America Fund*, WC Docket No. 90-90, Second Report and Order and Order on Reconsideration, FCC 15-189 (2014) at ¶ 126.

<sup>37</sup> *Third Report and Order*, ¶ 87; *Modernization NPRM*, at ¶¶ 213.

<sup>38</sup> *Ysleta* at ¶ 54.

Grove sought bids through the FCC Form 470 process for its E-rate eligible services. In *Ysleta*, the Commission stated – in dicta – that a price for a piece of *equipment* two to three times “the prices available from commercial vendors would not be cost-effective, absent extenuating circumstances.”<sup>39</sup> The example the Commission gave in *Ysleta* was of a piece of equipment. Equipment, unlike services, are commodities and more easily comparable. Even so, people often make purchasing decisions based on the quality of the brand of the product. The same is true – and even more so – for services. Evaluations of competing services are, of course, different than evaluating bids for the same piece of equipment. When evaluating a service, Applicants will have to consider the reliability of the service, the ability of the service provider to restore service in downtimes (including the technical expertise of the staff), and if the service provides the elements the Applicant would be purchasing (for example, are we really getting the amount of Internet access we have ordered?). Accordingly, USAC should not use *Ysleta* to support its analysis when comparing services, especially when the bids are different and include different, eligible services – such as on-site technical support and firewall services. As described above, Grove compared the quality of services of Meet Point with the services provided by OneNet and AT&T and reached the conclusion that Meet Point’s services were superior.

Third, the *Ysleta* decision does not establish a standard that applicants are precluded from selecting bids that are twice as expensive as “the lowest bid.” The standard in *Ysleta* is “two or three times” the prices that are **commercially available** for those services,<sup>40</sup> which begs the question: *What would have been the pricing of the lower bidders had they included the additional, eligible services that Meet Point provides, or if those lower-priced bidders had the level of expertise of the Meet Point staff?* Of course, the answer to that question is “unknown”

---

<sup>39</sup> *Id.*

<sup>40</sup> *Id.*

which means comparing these two bids using the *Ysleta* standard is a moot exercise and is not a fair evaluation of what is and is not cost effective.

Is Meet Point's bid "too expensive" for USAC to fund? We disagree with the conclusion that it is. The only way to determine if the bid is "too expensive" is to compare it to other commercially available services. USAC did not compare Meet Point's bid, which provided for different levels of support (cell phone numbers for the principals, on-site support and turn up) and different services (firewall services) than the other bidders, to other similar, commercially available offerings. USAC, in trying to make that determination could have surveyed local providers to determine what the commercially reasonable local price would be for a similar set of services (both scope and quality), or USAC could have used existing information they have gathered via 471 submissions about similar Internet access services provided in Oklahoma. We believe the price that Meet Point charges, given the level of support, the technical expertise of their staff and additional services offered, is commercially reasonable.

Additionally, we note that USAC funded the 2014 FRN for the District. USAC knew exactly how much they were paying for exactly how much bandwidth. USAC has cost-effectiveness standards before they fund applications to "red flag" funding requests that are out of a normal range. The District's 2014 FRNs did not trigger one of those USAC pre-funding cost effectiveness review. For USAC to fund the FRN, knowing exactly how much they were paying for a specific amount of bandwidth and services and then years later demand that the District repay that funding is patently unfair to the District.

Finally, the Commission in *Ysleta* was also describing a situation in which there was only one bidder, and therefore no competitive bidding, this precluding the applicant from any

comparison of services or price.<sup>41</sup> In such a case, the applicant is at the mercy of the service provider's pricing and does not have a choice as to providers. Grove was not held hostage to one provider. It received multiple bids and made a reasoned judgment regarding the services and comparative costs that met its needs through its competitive bidding process.

The reason that Grove selected a more expensive service provider – even though funding for schools is tight in Oklahoma – is that a properly functioning Internet service is critical to the success of its students. The evaluation categories of location, service history, expertise of the company and understanding the needs of the District all relate to whether the Internet access service will function as expected or be repaired as quickly as possible. Internet access services are as important to Grove as its other utilities, including heat and water. With the way the curriculum is structured, the schools simply cannot function if the Internet is not accessible. It is not cost-effective for either the District or the E-rate program to pay for an Internet service – no matter how inexpensive it is – that does not further the goal of providing students with access to greater educational opportunities. Further, the District believed it was cost-effective for its needs as a small, rural district, to pay extra for a service that included enhanced levels of support and protection (*i.e.*, the firewall). Grove chose the service provider that was most cost-effective for its needs.

### **C. USAC's Decision in This Case Undermines Program Policies and Goals**

Application of USAC's decision on a consistent basis will not further E-rate program policies and goals. First, it will force applicants in some cases to select a provider that does not offer the most cost-effective services for the applicants' needs – and likely could cause applicants to perform a disingenuous bid review process. Second, this decision could require

---

<sup>41</sup> *Id.*

applicants to weight price more heavily in the bid evaluation process – which is not required by Commission rules – in order to try to meet USAC’s newly created standard. Finally, the District will suffer significant harm if its funding is denied.

First, USAC’s attempt to second-guess the work of the District will force applicants to select a lower-priced offering, regardless of quality or other relevant criteria, so they will not be subject to second-guessing months or years after the conclusion of the competitive bidding process. To prevent this potential denial of funding, applicants will be forced to select a lower-price bidder, notwithstanding their review of the vendors’ bids using the other factors important to the individual applicants.

Using such a standard will lead to a disingenuous bidding process. Applicants are required to consider all valid bids received.<sup>42</sup> Is it really USAC’s position that an applicant must evaluate a bid that is two times more expensive than the other bids, but that bid (under USAC’s interpretation of *Ysleta*) must always lose? Are applicants supposed to manipulate the evaluation process so that the more expensive vendor receives fewer points, notwithstanding the reviewer’s actual analysis of the bid responses? A fair and open competitive bidding process cannot have pre-determined outcomes. Such a result could cause applicants to violate their own competitive bidding requirements. Further, what is the point of allowing the applicant the “maximum flexibility” to consider service history, quality of service, or other reasonable factors of a bid that USAC has pre-determined must always lose? An applicant that follows all of its own state and local procurement rules should not be prohibited from selecting a bid that meets its needs, but for a non-codified standard that USAC has decided to impose. If it is truly the intention that bids that are twice as much as the lowest bid are, on face, not cost-effective and should never win,

---

<sup>42</sup> 47 C.F.R. § 54. 511(a).



then the program should explicitly allow applicants to disqualify those bids before the bid evaluation process begins, even if no disqualification factors are listed by the applicant in the FCC Form 470 and/or RFP. As it stands right now, applicants are required by FCC rules to evaluate all bids received and applicants do not have the authority to disqualify bids that are twice as expensive as the lowest bid received.

Second, USAC's process to determine cost-effectiveness is flawed. USAC's current interpretation of Ysleta places the applicant in an untenable position - the applicant is required to evaluate all bids, required to use specific bid criteria weighted in a specific manner and conduct an open and fair competitive bidding process. Even when an applicant complies with all of these rules and follows all of the approved processes, if a bid is awarded the most points and determined to be the best fit for the applicant's needs, but is twice as much as a lower bid, what can an applicant do? The applicant can't simply throw out the bid or disqualify it – not only would the winning bidder have legal recourse against the applicant should the applicant throw out that bid, but the applicant could very well be in violation of local or state competitive bidding rules for not proceeding with the bid that was awarded the most points. Under USAC's interpretation of Ysleta, that bid should never win, but using the FCC's competitive bidding process and rules it did. What is the point of following all of the competitive bidding rules if it produces an outcome that USAC won't fund?

There are no allegations of competitive bidding rule violations by the District. USAC's concerns about cost-effectiveness seem better directed at the bid evaluation process that produced an outcome that USAC deems too expensive (perhaps the Commission should set more stringent procedures for weighting Price of Eligible Goods and Services at 50% of the total available points) than directing those concerns at the District. How can a winning bid be

determined to be “too expensive” by USAC if the applicant properly evaluated price (and correctly awarded points) according to the Commission’s rules and procedures?

Third, USAC’s denial suggests the price differential should have been weighted more heavily than the District weighted it. To reach such a result, USAC is effectively overruling Commission precedent that only requires that pricing be given at least one more point than any other individual category.<sup>43</sup>

At a minimum, USAC’s decision here substitutes its judgment on the merits of the competitive bidding process for that of the District. When the Commission established the rules for the E-rate program in 1997, it stressed that a fundamental principle would be the determination of local needs by local decision-makers regarding what services would work best for that school or school district.<sup>44</sup> It did not try to impose a top-down regime where the federal government decided the merits of each service choice of a particular school or district. The idea was that the thousands of schools and districts would know their own technology needs better than the federal government. The Commission has not wavered from this principle. If this decision stands, USAC would be free to evaluate the merits of the respective bidders without the knowledge that applicants have regarding service quality, service history, personnel

---

<sup>43</sup> As described above, USAC appears to be going beyond Commission precedent to establish a new standard without basis in Commission precedent. USAC, however, is not authorized by the Commission to interpret Commission rules. Under the Commission’s rules, USAC “may not make policy, interpret unclear provisions of the statute or rules, or interpret the intent of Congress.” 47 C.F.R. § 54.702(c). To the extent the Commission’s rules are unclear, USAC has no authority to act without first seeking guidance from the Commission. *See id.* Moreover, the District proceeded entirely in accordance with Commission precedent when it evaluated relevant factors other than price. As a result, USAC has acted outside its authority by finding that Grove, despite having strictly followed the Commission’s rules and precedent, failed to adhere to the Commission’s requirements. Furthermore, if the Commission decides that a revision to the rule would advance program goals, such an interpretation should be provided by the Commission before it is applied, and following a notice-and-comment rulemaking.

<sup>44</sup> *Universal Service Order* at ¶¶ 481, 574.

qualifications, and the value they are receiving for the services purchased. There is simply no way USAC can make a proper evaluation of the bids without that information. In this case, while Grove has attempted to provide that information in responses to USAC's reviews, it appears that USAC has discounted the information or failed to take it into consideration, focusing exclusively on the price of the services.

**D. If USAC Still Finds the Services Were Not Cost-Effective, USAC Should Commit Funding for Grove at a Level That Is Cost-Effective**

USAC should, at a minimum, approve part of Grove's funding request. There is precedent for such an approach. In the *Fifth Report and Order*, the Commission provided direction for USAC for recovery of funding when it was improperly disbursed.<sup>45</sup> Cost-effectiveness is not directly addressed in that order.<sup>46</sup> However, some of the other illustrations provide guidance for the cost-effectiveness rule. If a carrier charges the beneficiary "an inflated price," the *Fifth Report and Order* directs that USAC should recover amounts disbursed in excess of what similar situated customers are normally charged in the marketplace."<sup>47</sup> Similarly, here, if the standard is that cost two times other pricing is not cost-effective, then, by implication, a price 1.9 times the cost is cost-effective. As such, USAC could calculate the cost of the

---

<sup>45</sup> *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Fifth Report and Order and Order, FCC 04-190 (2004) at ¶¶ 15-44 (*Fifth Report and Order*).

<sup>46</sup> *Id.* The Commission states that full recovery is appropriate for competitive bidding violations. However, this is not a competitive bidding violation. USAC found no issues with the competitive bidding process; it disagreed with the outcome. There are no allegations that the process was not fair and open, price was not the primary factor or that bids were not solicited for at least four weeks.

<sup>47</sup> *Fifth Report and Order* at ¶ 30. The Commission also discusses situations in which the beneficiary has requested a "clearly excessive" level of support. That situation is not applicable here, as the examples are those when the beneficiary is requesting a number of lines or equipment that is beyond what is necessary. There is no dispute here that the District requires this level of capacity for broadband services, nor are there any allegations that these services are duplicative or redundant.

eligible service at 1.9 times that of a lower price and fund that amount for Grove. In addition, the Commission has ruled that, when two providers are providing the same service and one is less expensive, the applicant shall be reimbursed for its Internet connection at the lower rate.<sup>48</sup> Following that logic, USAC could reimburse the applicant at the rates offered by a different provider. Such an approach would minimize the harm caused by USAC's delay in determining it had an issue with Grove's selection of Meet Point as its service provider.

\* \* \*

For the reasons stated above, the District respectfully requests that USAC reconsider its initial decision and grant its funding requests for FY 2014. As the foregoing has demonstrated, the District met the Commission requirements for competitive bidding, and selected the most cost-effective bid available to meet its needs.

---

<sup>48</sup> *Schools and Libraries Universal Service Support Mechanism*, Requests for Review by Macomb Intermediate School District, CC Docket No. 02-6, Order, FCC 07-64 at ¶ 9 (2007). This rule is applicable when the applicant could have purchased all of the services from one provider at the lower rate but chose not to, and when the services provided do not exceed the total capacity required.

## **List of Exhibits**

**Exhibit 1:** Invitation for Competitive Bid (AKA: RFP)

**Exhibit 2:** Bids Received

**Exhibit 3:** 471 Application

**Exhibit 4:** COMAD

**Exhibit 5:** Administrator Decision Letter

**Exhibit 6:** Bid Evaluation Sheets

## **Affidavit**

**Before the Federal Communications Commission  
Washington, D.C.**

In the Matter Of	)	
	)	
	)	
Schools and Libraries	)	CC Docket No. 02-6
Universal Service Support Mechanism	)	
	)	
Request for Review and/or Waiver	)	Application Number 951256
By Grove Elementary School District	)	
of the Funding Decisions by the	)	
Universal Service Administration Company	)	

**Affidavit of Grove School District**

I, Rusty Carmichael, swear:

**BACKGROUND**

1. During the 2014/2015 school year I served my third year at Grove Elementary School District as the Dean of Students which included Curriculum/Textbook Coordinator, Classroom Technology Integration Specialist, overseeing Student Activities, assisting with transportation scheduling and driving a morning and afternoon bus route, and evaluating certified teaching staff. As part of my technology duties I was responsible for the management of the district Information Technology resources, trouble shooting the district network, and completing E-rate forms and applications. Dean of Students was, and continues to be, my primary job function dealing with student discipline, managing district personnel, providing professional development for teaching staff, observing teaching methods and assisting teachers with methods for improvement, fostering positive school/community relations, and establishing a safe and disciplined school environment.

2. With the exception of personal use of technology in my own classroom during 30 plus years of teaching I have no other experience or background with technology and my only experience with procurements has been at Grove Elementary School District during the years I have served as Dean of Students in ordering district textbooks and related classroom supplies. I have no formal training in technology; my technology training has all been through trouble shooting efforts to solve issues or breakdowns in the district's aging technology infrastructure.
3. I graduated from college in 1984 with a B.S. in Elementary Education. I have taught elementary education in Oklahoma, Texas, and California for the past 32 years. In 2003 I added the additional teaching areas of History/Government, Earth Science, and Journalism so that I could teach more than just elementary classes. In 2009 I began work on my Masters in Educational Leadership and added Elementary Principal to my teaching credential in 2010. For the last four years I have been working on an Educational Doctorate in Educational Leadership and should be completed in December 2016. Grove Elementary School District employed me in 2004/2005 as the sixth through eighth grade history/geography teacher until I moved to become the Dean of Students in 2011/2012.
4. Grove Elementary School District is a pre-kindergarten through eighth grade elementary school district located in the northeastern fringes of Shawnee, Oklahoma in Pottawatomie County. Through continual housing developments in the district Grove's current student population is nearing 500. In the 2014 school year Grove Elementary School District was classified as a rural school, however, with Shawnee's urban sprawl Grove is now classified as an urban district. Grove School began in 1893 and part of our building dates from 1927. Through the years, as the school has grown, additions have been made to the



1927 structure and currently the district consists of one building housing all district students in approximately 34 classrooms and one computer lab.

5. I am the only member of the technology staff and my available time to spend on technology issues is very limited due to the other duties of my position. With the very limited amount time to allocate to the district technology I must rely on vendors that are rapidly and easily available and understanding of our unique needs. When I started working with the district technology resources I was faced with servers that were approximately nine years old, and most of the district infrastructure including switches and wireless access points were as old or older and failing constantly. I am faced each year with little to no budget to maintain and update the district resources, and virtually no time available to devote to diagnosing and problem solving issues as they arise. My Dean of Students duties include disciplining students sent to the office, observing and evaluating all certified teachers, scheduling and overseeing student activities, planning and directing district inservice programs, coordinating district curriculum, overseeing and coordinating district transportation services, attending all special education and departmental meetings, and serving as the district Technology Director. As Technology Director I am responsible for maintaining the district's aging servers, maintaining and repairing the district's 218 Windows desktop computers, 69 MacBook laptop computers, 45 Macintosh desktop computers, 197 iPad tablets, district wide wireless and wired networks, insuring that all computer devices are updated and that teachers are inserviced in technology usage, and training teachers in methods to integrate technology into classroom practices.

## **IMPORTANCE OF TECHNOLOGY**

6. While there is little funding available to dedicate to technology, the use of technology in the classrooms and administrative functioning of the district is of great importance. Grove Elementary School District has been working to increase the use of classroom technology and as such both teachers and students have increased their usage of technology and online activities. All teachers utilize an online grade book that is linked to the district student information system. This system is accessible by parents and students 24 hours a day. The teachers take and record hourly attendance via their online grade book, as well as record and post grades, write lesson plans, research lesson activities, communicate with parents, enhance lesson content, download classroom related resources, stream video and audio content for use in presenting lesson concepts, utilize online digital content in lieu of printed text materials, and use online resources for continued professional development activities. Students at all levels conduct research activities, complete online projects, collaborate with other students and content professionals via online services, stream audio and video content to further enhance their learning experience, receive and submit assignments through online resource services, access enhanced textbook resources through publishers' website, check on their current grades and progress via the online grade book, and communicate with their teachers.
7. In years when the district was receiving insufficient bandwidth we experienced loss of connections, dropped services, continual frustrations as teachers could not complete the required online activities of attendance, posting grades, and creating lesson plans. Frequently teachers would simply refuse to complete the required activities because of the inordinate amount of time required. Teachers became frustrated during the repeated attempts that were required to just post hourly attendance especially when the secure

connection would be lost while waiting for the over tasked bandwidth to catch-up with the requests. Grades and attendance could not be recorded, neither teachers nor students could view online instructional content and in many cases websites would not even load due to the maxed out bandwidth.

8. During the time that the district was being served by XO communications calls to the service center would result in routing from automated service to automated service, often taking 30 minutes or more before contact could be made with an individual and usually that individual was away from their desk and a message would have to left with callbacks occurring hours to days later. With virtually no IT staff this is not an acceptable situation. During the time the district was being served by MeetPoint calls were, almost always, answered immediately by an individual ready to assist and any callbacks were usually made within the hour.

## **THE PROCUREMENT**

9. In my 3 years as Dean of Students I determined our needs included:
  - i. We needed affordable connectivity sufficient to handle our needs. The district moved from 3 Mbps to 10 because bandwidth was constantly maxed out causing massive connectivity issues. Even after moving to 10 Mbps it was evident that much more bandwidth was needed. Doubling the bandwidth to 20 Mbps was considered. However, during a review of information from the United States Department of Education and Office of Educational Technology as well as the State Educational Technology Directors Association (SETDA) it became apparent that district needed at least a 50 Mbps connection.;

- ii. We needed reliable connectivity to support the learning and teaching experiences; and
- iii. We needed quality connectivity to assure that the school received content appropriate to our needs, and filtered out content that was inappropriate to keep the district CIPA compliant, and
- iv. We needed network protections (i.e., firewall) sufficient to protect the network from third-party spam, attacks, and viruses, and
- v. We needed to ensure that, if the network went down, our provider would be available to assist with restoring service as soon as possible. We desperately needed a provider that could be contacted quickly and easily, and that was knowledgeable of our configurations and needs.

10. Accordingly, the district decided what evaluation criteria to use to evaluate the bids received.

11. I received a list of possible categories from our consultant, CRW Consulting, but I determined which categories we would use for evaluation of the bids.

12. The competitive bidding process was fair and open. MeetPoint did not have any role in the development of the RFP nor did it have any information not available to any other bidder.

#### **THE EVALUATION PROCESS 2014 (Internet)**

13. I decided to use the categories of Price of Eligible Goods and Services and Service History when evaluating and ranking the bids. Since cost was an important factor, Price of Eligible Goods and Services received a maximum value of 40 points, Service History

received a maximum value of 20 points, and the maximum a bid could receive was 60 points.

14. When evaluating the Price of Eligible Goods and Services each company's bid was evaluated based on the cost per Mb (megabit) for a 50 Mb connection. For the evaluation of Service History past experiences with company personnel and ease of contacting and working with the provider was taken into consideration. MeetPoint was allotted 20 out of 20 points in this category since the district has had a great working relationship with the provider's personnel in the past, and the key personnel were very familiar with our needs. AT&T was allotted 10 out of 20 points in this category since the district has experienced difficulty contacting, scheduling, and working with the company in the past. Before I became involved with the district's technology administration, the district left AT&T and moved Internet services to Cox. The separation did not go well and the district had to involve the services of the school's attorney to complete the separation. During my time working with district technology I found it extremely difficult to get through to AT&T when dealing with telephone issues due to their automated system. While attending conferences and workshops I heard stories from other technology persons that they were not getting the bandwidth from OneNet that they were promised, some stating that they were only getting about half the bandwidth they were expecting. I also read reports online where OneNet refused to assist customers when service was lost and frequently blamed the loss on the customer until after much complaining the problem would be found to be on OneNet's end. According to the evaluation results MeetPoint scored 55 out of 60 points while AT&T scored 40 out of 60 points. My experience with the personnel from MeetPoint is that whenever I call a person immediately answers, is knowledgeable of what I am talking about, and are able to help me resolve the issue quickly. During the

2013/2014 school year, the district had Internet service with XO communications, XO was unable to help me connect the surveillance camera servers to the district network. I contacted Mike Pennell at MeetPoint and he immediately assisted me in getting the camera servers connected and addressed through the network. During the 2014/2015 school year the district already had a working relationship with all of the MeetPiont personnel since they have been our venders for email, email archiving, domain name hosting, Palo Alto firewall management, and Windows Server Support for more than the past 15 to 20 years. I have never experienced a time when calling for technical support/help that my call wasn't answered immediately and I was either told verbally how to correct the issue, one of the technicians was able to remote in and correct the problem, or Mike Pennell and one of his technicians drove to my location that day to correct the issue.

15. I carried out the evaluation process by myself. I conferred with my superintendent and discussed the results of the process along with the district's needs. During the evaluation process all materials submitted by the bidders was reviewed and taken into consideration.
  - a. When evaluating the Price of Eligible Goods and Services each company's bid was evaluated based on the cost per Mb (megabit) for a 50 Mb connection (or the closest amount to 50 Mb bid by the company). For the evaluation of Service History past experiences with company personnel and ease of contacting and working with the provider was taken into consideration. MeetPoint was allotted 20 out of 20 points in this category since the district has had a great working relationship with the provider's personnel in the past, and the key personnel were very familiar with our needs. AT&T was allotted 10 out of 20 points in this category since the district has experienced difficulty contacting, scheduling, and

working with the company in the past. According to the evaluation results MeetPoint scored 55 out of 60 points while AT&T scored 40 out of 60 points.

b. I believe that all bidders included and priced the same or similar services.

16. The total points awarded to the winning bidder were 55.

#### USAC REVIEW OF THESE APPLICATIONS

17. My bid evaluations and evaluation process was checked and approved by the district's E-rate consultant CRW Consulting. USAC approved applications so we kept doing the same thing and never had any concern with the process.

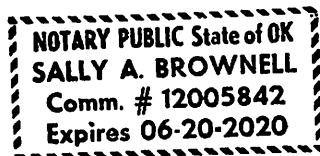
18. As I understand the standard, we were to make a choice of the most "cost-effective" provider. Accordingly, we evaluated the quality of the services offered and the price of those services.

I certify under penalty of perjury that the foregoing is true and correct.

Leah Crummett  
2800 N Bryan, Shawnee, OK 74804  
[Name]  
[Address]

Subscribed and sworn to before me this 12 day of July, 2016.

[Seal]



Sally A Brownell  
Notary Public

**Exhibit 1:** Invitation for Competitive Bid (AKA: RFP)



**IFCB Posted**

06 November 2013

**Grove School Co  
District 27****District Address**

2800 N Bryan Rd

Shawnee, OK 74801

**IFCB ID:** 248700001161457**IFCB Deadline:**

04 December 2013

**Questions Due By:**

27 November 2013

**IFCB Requirements**

- All Questions and Bids must be submitted using the on-line IFCB system. If for some reason the system is down before the respective deadline, please email your bid to [info@crwconsulting.com](mailto:info@crwconsulting.com) or fax it to 918.445.0049. Bids or questions submitted in this fashion will be disqualified if the on-line system is active at the time of submission.
- Bidder must agree to participate in USF Program (AKA "E-rate") for the corresponding funding year.
- Please include the correct Service Provider Identification Number (SPIN) on your bid.
- By submitting a bid, bidder certifies that the bidder does have a valid (non-red light status) SPIN for the E-rate program at the time of submission. Should the Applicant discover that the bidder is on red light status, or if the FCC classifies the bidder as on red-light status before work is performed and invoices are paid, the contract will be null and void and the applicant will have no payment obligations to the bidder.
- Bidder is expected to provide the lowest corresponding price per E-rate rules. See <http://www.usac.org/sl/service-providers/step02/lowest-corresponding-price.aspx> for details.
- Contracts must not prohibit SPIN changes.
- Bidder must agree to provide the Applicant the choice of discount methods (SPI or BEAR).
- Bidder will be automatically disqualified if the District determines that the bidding company has offered any employee of the District any individual gift of more than \$20 or gifts totaling more than \$50 within a 12 month period.

- All contracts awarded will be contingent upon E-rate funding and final board approval. The applicant may choose to do all or part of the project upon funding notification.
- All contracts awarded under this IFCB bidding process may be voluntarily renewed by the applicant, upon written notice to the provider, for five consecutive one year terms.
- WEB HOSTING VENDORS ARE REQUIRED TO FILL OUT THE ATTACHED COVER SHEET FOR WEB HOSTING BIDS. WEB HOSTING BIDS SUBMITTED WITHOUT THAT COVER PAGE WILL BE DISQUALIFIED. VENDORS NOT SUBMITTING WEB HOSTING BIDS ARE NOT REQUIRED TO USE THE COVER PAGE.

There is an additional document associated with this IFCB. Please click the buttons to download the document.

[GroveWHCoverPage.docx](#) 

## Services and Equipment Requested

Local phone service - Approx 4 lines

Long distance service - Approx 4 lines; applicant currently uses approx 1,000 minutes per month

Wireless internet access/data plan for air card - Approx 1 air card

Wireless internet access/data plan for tablet device - Approx 3 tablet devices

Internet Access - Minimum 10Mb bandwidth; applicant is considering upgrading to 20Mb bandwidth. The terminating address for this circuit is 2800 N Bryan Rd, Shawnee, OK 74801; (405) 275.

Web Hosting - For one site. There is a Web Hosting Cover Page associated with this IFCB that is available for download. WEB HOSTING BIDS SUBMITTED WITHOUT THE ATTACHED COVER PAGE WILL BE DISQUALIFIED.

[Upload Bid](#)



## Questions Received with District Answers:

[Submit a Question](#)

No Data

[Home](#) [About Us](#) [Services](#) [e-Rate Info](#) [Testimonials](#) [Contact](#)

Sign up for our new sletter :



Your Email

[Submit](#)

**Exhibit 2: Bids Received**

# E-Rate Proposal for Managed Internet Service

November 13, 2013

To: **Grove School Co District 27**  
2800 N Bryan Rd  
Shawnee, OK 74801

From: JAN LUPTON-LEIBOLD, AT&T Sales/Marketing Program Support  
405 N BROADWAY AVE, RM 1029, OKLAHOMA CITY, OK 73102  
Office: (405) 319-6007  
Email: jl840a@att.com

## Introduction

In response to **Grove School Co District 27** Form 470 bid #248700001161457, I'm providing information on an AT&T solution that may meet your requirements and qualify for E-Rate funding. The solution includes the following components:

- Managed Internet Service (MIS) is an Internet access service that combines a high-speed, dedicated connection with consolidated application management. It lets you reliably access information resources and communicate with Internet users worldwide. MIS includes proactive, 24x7 network monitoring, enhanced network security features, and maintenance of the communications link between your locations and the AT&T network. AT&T's Service Provider Identification Number (SPIN) for Managed Internet Service (MIS) is 143001192.

## Features and Benefits

The solution gives you the following:

- Network Address Translation (NAT)—NAT (standard with MIS with Managed Router

Subsidiaries and affiliates of AT&T Inc. provide products and services under the AT&T brand. © 2013 AT&T Intellectual Property. All rights reserved. AT&T, the AT&T logo, and all other AT&T marks contained herein are trademarks of AT&T Intellectual Property and/or AT&T affiliated companies. All other marks contained herein are the property of their respective owners. The contents of this document are proprietary and confidential and may not be copied, disclosed, or used, in whole or in part, without the express written permission of AT&T Intellectual Property or affiliated companies, except to the extent required by law and insofar as is reasonably necessary in order to review and evaluate the information contained herein. Managed Internet Service is provided by AT&T Corp. For MIS with Managed Router, installation charges are waived for telephone-supported installation; the customer is responsible for the provisioning and monthly cost of one phone line for management and troubleshooting of the managed service and router. The customer is responsible for the conduit/structure as well as the path from the property line to the demarcation point for access to the primary route.

**Proposal Validity Period**—The information and pricing contained in this proposal is valid until 1) the parties enter into a fully executed binding contract, 2) AT&T timely withdraws the proposal, or 3) the E-Rate filing window closes for the then-current E-Rate Funding Year, whichever first occurs. **Terms and Conditions**—Unless otherwise stated herein, this proposal is conditioned upon negotiation of mutually acceptable terms and conditions. **Proposal Pricing**—Pricing proposed herein is based upon the specific product/service mix and locations outlined in this proposal, and is subject to AT&T's standard terms and conditions for those products and services and the AT&T E-Rate Rider unless otherwise stated herein. Any changes or variations in the standard terms and conditions, the products/services, length of term, locations, and/or design described herein may result in different pricing. Prices quoted do not include applicable taxes, surcharges, or fees. In accordance with the tariffs or other applicable service agreement terms, Customer is responsible for payment of such charges. **Disclaimer**—For purposes of this Proposal, the identification of certain services as "eligible" or "non-eligible" for Universal Service ("E-Rate") funding is not dispositive, nor does it suggest that this or any other services in this Proposal will be deemed eligible for such funding. Any conclusions regarding the eligibility of services for E-Rate funding must be based on several factors, many of which have yet to be determined relative to the proposed services and equipment described herein. Such factors will include, without limitation, the ultimate design configuration of the network, the specific products and services provisioned to operate the network, and the type of customer, and whether the services are used for eligible educational purposes at eligible locations. In its proposal, AT&T will take guidance from the "Eligible Services List" and the specific sections on product and service eligibility on the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") website [www.usac.org/sl](http://www.usac.org/sl). This site provides a current listing of eligible products and services, as well as conditionally eligible and ineligible services. This guidance notwithstanding, the final determination of eligibility will be made by the SLD after a review of the customer's E-Rate application for this proposal. If AT&T is awarded the bid for this project, AT&T will provide assistance on the E-Rate application solely on matters relative to the functionality of the services and products which comprise the network. Nevertheless, the responsibility for the E-Rate application is with the customer. AT&T is not responsible for the outcome of the SLD's decision on these matters. **Broadband Internet Access**—For information about AT&T's broadband Internet access services, please visit [www.att.com/broadbandinfo](http://www.att.com/broadbandinfo).

Quote #xx



## E-Rate Proposal for Managed Internet Service

November 13, 2013



service) protects your local private network addresses by hiding them from open Internet addressing. This approach has become an increasingly important defense against network reconnaissance.

- Packet Filtering—The packet filtering feature (standard only with MIS with Managed Router service) helps to prevent unauthorized access to your internal network and controls authorized access to Internet sites. Our engineers work with you to define a customized filtering plan and oversee the implementation and maintenance of packet filtering tables in your router.
- Redundancy—We provide service availability of 99.999% to help ensure that your Internet traffic gets through. The design and proactive monitoring of our nationwide backbone network make it highly reliable. Because the network architecture features redundant routers, switches, and power supplies, we can reroute traffic around outages and restore service almost instantaneously.

**Take the  
pledge to  
stop texting  
while driving**

[Click to learn  
more.](#)

## Advantages of AT&T

Working with AT&T gives you the following advantages:

- Agility—With our integrated, agile networking platform, you can quickly add or change applications as your business needs dictate.
- Experience and Expertise—With more than 100 years of experience, AT&T draws on its expertise to champion innovation and develop comprehensive, reliable solutions.
- Extensive Reach—We offer a broad range of wireless, voice, and data services throughout the U.S. We also serve thousands of enterprise and multinational business corporations on six continents. In fact, we offer local support in many communities around the world.
- Control—AT&T gives you easy access to timely performance information and online tools so you can be in control of your network.
- E-Rate Experience—AT&T has participated in the E-Rate program for schools and libraries since the program's inception in 1998, and we're one of the program's largest service providers. We're proud to bring our technology, expertise, E-Rate knowledge, and education experience to your school or library, helping expand affordable access to advanced telecommunication services. For more information about AT&T and its participation in the E-Rate program, go to [www.att.com/erate](http://www.att.com/erate) and download the E-Rate brochure.



## E-Rate Proposal for Managed Internet Service

November 13, 2013



### Solution Pricing – 36 Month Term – Contract Required

	<u>Monthly</u>	<u>Install</u>
10Meg eaMIS Plus	\$824.60	\$00.00
20Meg eaMIS Plus	\$997.60	\$00.00

This quote assumes that adequate conduit/entrance into your facility exists to permit fiber installation into your equipment room.

If you wish to proceed with this offering please contact me, so I can conduct a check of AT&T's network fiber placement that would serve your location. This check will determine if any special construction charges would apply. This occurs less than 5% of the time; however, it does take 3-4 weeks to get confirmation.

This will be a tele-installation. We will drop ship a router that requires connectivity to the power cable, the cables from the router and plugged into associated LAN port on your switch. A telephone line is required for remote access to the router. If you prefer that AT&T install the router a \$750 charge would apply.



## **Meet Point Networks, LLC**

P.O. Box 339  
Bixby, OK 74008  
[www.meetpointnetworks.com](http://www.meetpointnetworks.com)

11/26/2013

Grove  
2800 North Bryan Avenue  
Shawnee, OK 74804

To whom it may concern,

In the following pages you will find a proposal for services prepared by Meet Point Networks, LLC for Grove. The proposal is in response to the district's posted ERate form 470. The proposal is for a Internet Access circuit.

Page 1 : Proposal of Services  
Pages 2 - 4 : Pre-signed Service Agreement

We hope that you will take the time to consider our proposal. If the district finds the quote acceptable please sign and return (fax or email).

Please do not hesitate to contact us with any and all questions.

Mike Pennell  
President  
[mpennell@meetpointnetworks.com](mailto:mpennell@meetpointnetworks.com)  
Phone : 918-633-6896  
Fax : 918-512-4400



Meet Point Networks, LLC

P.O. Box 339

Bixby, OK 74008

Voice 918-633-6896 - Fax 918-512-4400 - Web [www.meetpointnetworks.com](http://www.meetpointnetworks.com)

SPIN# 143035519

## Customer Service Proposal

Proposal Date : November 26, 2013

Proposal # 176

### Customer Information

#### Grove

2800 North Bryan Avenue  
Shawnee OK 74804

Meet Point Networks Rep

Mike Pennell (918)633-6896

Summary of Proposed Services : 10, 20, 50, 70, 100 Mb Internet Access Circuit Quotes - Including Internet maintenance provided by NewNet 66.

*\*\*Any estimates, in this proposal, based on funding from the Oklahoma Universal Service Fund are subject to application and approval by the Oklahoma Corporation Commission and any difference in actual OUSF funding and the monthly recurring charges shall be the responsibility of the customer.*

### Proposed Services and Terms

*\*\*Taxes and Fees not Included*

	Service Description	Type	Qty	Term	Monthly	Annual	One Time
1	10 Mb Internet Bandwidth	New	1	60	\$2,115.50	\$25,386.00	\$500.00
2	100 Mb Internet Bandwidth	New	1	60	\$5,129.50	\$61,554.00	\$500.00
3	20 Mb Internet Bandwidth	New	1	60	\$2,877.50	\$34,530.00	\$500.00
4	50 Mb Internet Bandwidth	New	1	60	\$4,132.50	\$49,590.00	\$500.00
5	70 Mb Internet Bandwidth	New	1	60	\$4,557.50	\$54,690.00	\$500.00

Internet Maintenance is provided by NewNet 66 and is included in the pricing above.

Internet Maintenance includes:

24 x 7 Internet Access Troubleshooting & Repair

On site visits to restore Internet Access, if necessary

Unlimited Email / 5Gb Web Hosting

For more information please visit NewNet 66's description of services overview at [www.newnet66.org](http://www.newnet66.org)





Meet Point Networks, LLC

P.O. Box 339

Bixby, OK 74008

Voice 918-633-6896 - Fax 918-512-4400 - Web [www.meetpointnetworks.com](http://www.meetpointnetworks.com)

## Meet Point Networks Service Agreement

11/26/2013

SPIN# 143035519

### Grove

2800 North Bryan Avenue  
Shawnee OK 74804

Proposed Services : Please select desired service by checking a box below.

Service Description	Type	Qty	Term	Monthly	Annual	One Time
<input type="checkbox"/> 10 Mb Internet Bandwidth	New	1	60	\$2,115.50	\$25,386.00	\$500.00
<input type="checkbox"/> 20 Mb Internet Bandwidth	New	1	60	\$2,877.50	\$34,530.00	\$500.00
<input type="checkbox"/> 50 Mb Internet Bandwidth	New	1	60	\$4,132.50	\$49,590.00	\$500.00
<input type="checkbox"/> 70 Mb Internet Bandwidth	New	1	60	\$4,557.50	\$54,690.00	\$500.00
<input type="checkbox"/> 100 Mb Internet Bandwidth	New	1	60	\$5,129.50	\$61,554.00	\$500.00
<input type="checkbox"/>						

By signing this Service Agreement, you represent that you are the authorized Customer representative and the above information is true and correct and you accept this Agreement. Both parties agree that each party may use electronic signatures to sign this Service Agreement.

Meet Point Networks may withdraw the proposal at any time prior to Customer signature. If within (30) days after Customer signature, Meet Point Networks determines that customer location is not serviceable under Meet Point Networks normal installation guidelines, Meet Point Networks may withdraw this Service Agreement without liability.

Customer Authorized Signature

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print

\_\_\_\_\_  
Title or Position

\_\_\_\_\_  
Date

Meet Point Networks Authorized Signature

*Mike Pennell*

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Mike Pennell

\_\_\_\_\_  
Print

\_\_\_\_\_  
President

\_\_\_\_\_  
Title or Position

\_\_\_\_\_  
11/26/2013

\_\_\_\_\_  
Date



**Meet Point Networks, LLC**  
P.O. Box 339  
Bixby, OK 74008

Voice 918-633-6896 - Fax 918-512-4400 - Web [www.meetpointnetworks.com](http://www.meetpointnetworks.com)

## Terms and Conditions

**OUSF - Any estimates in this bid based on funding from the Oklahoma Universal Service Fund are subject to application and approval by the Oklahoma Corporation Commission and any difference in actual OUSF funding and the monthly recurring charges shall be the responsibility of the customer.**

**E-Rate Customers - During the term of this contract, the applicant may choose any of the above service levels and upgrade to those levels upon written notice to Meet Point Networks. Meet Point Networks will determine the turn up time after the customer initiates the process.**

**The pricing is based upon a 60 month term. This contract represents a 12 month term with the option to renew four consecutive 12 month terms.**

**1. Tariffs/Service Guide** If Customer is purchasing any Services that are regulated by the FCC or any state regulatory body ("Regulated Services"), then Customer's use of such Regulated Services is subject to the regulations of the FCC and the regulatory body of the state in which the Customer location receiving these Regulated Services is located (which regulations are subject to change), as well as the rates, terms, and conditions contained in tariffs on file with state and federal regulatory authorities. Termination fees include, but are not limited to, nonrecurring charges, charges paid to third parties on behalf of Customer, and the monthly recurring charges for the balance of the Term.

**2. Service Start Date and Term** This Agreement shall be effective upon execution by the parties. The "Initial Term" shall begin upon installation of Service and shall continue for the applicable Term commitment set forth on the Cover Page; provided that if Customer delays installation or is not ready to receive Services on the agreed-upon installation date, Meet Point Networks may begin billing for Services on the date Services would have been installed. Meet Point Networks shall use reasonable efforts to make the Services available by the requested service date. Meet Point Networks shall not be liable for damages resulting from delays in meeting service dates due to construction delays or reasons beyond its control. If Customer delays installation for a period of three (3) months or longer after the parties' execution of this Agreement, Meet Point Networks reserves the right to terminate this Agreement immediately at any time thereafter and Customer shall be responsible for the full amount of construction costs and any other related costs incurred by Meet Point Networks as of the date of termination. AFTER THE INITIAL TERM, THIS AGREEMENT SHALL AUTOMATICALLY RENEW FOR ONE (1) YEAR TERMS (EACH AN "EXTENDED TERM") UNLESS A PARTY GIVES THE OTHER PARTY WRITTEN TERMINATION NOTICE AT LEAST THIRTY (30) DAYS PRIOR TO THE EXPIRATION OF THE INITIAL TERM OR THEN CURRENT EXTENDED TERM. "Term" shall mean the Initial Term and Extended Term (s), if any. Meet Point Networks reserves the right to increase rates for all Services by no more than ten percent (10%) during any Extended Term by providing Customer with at least sixty (60) days written notice of such rate increase. For the avoidance of doubt, promotional rates and promotional discounts provided to Customer will expire at the end of the Initial Term or earlier as set forth in the promotion language. Customer's payment for Service after notice of a rate increase will be deemed to be Customer's acceptance of the new rate.

**3. Termination** Customer may terminate any Service before the end of the Term selected by Customer on the Cover Page; provided, however, if Customer terminates any such Service before the end of the Term (except for breach by Meet Point Networks), unless otherwise expressly stated in the General Terms, Customer will be obligated to pay a termination fee equal to the nonrecurring charges (if unpaid) and 100% of the monthly recurring charges for the terminated Service(s) multiplied by the number of full months remaining in the Term. This provision survives termination of the Agreement. If Meet Point Networks is delivering Services via wireless network facilities and there is signal interference with any such Service(s), Meet Point Networks may terminate this Agreement without liability if Meet Point Networks cannot resolve the interference by using commercially reasonable efforts.

**4. Payment** Customer shall pay for all monthly Service charges, plus one- time activation and set up, and/or construction charges. Unless stated otherwise herein, monthly charges for Services shall begin upon installation of Service, and installation charges, if any, shall be due upon completion of installation. Any amount not received by the due date shown on the applicable invoice will be subject to interest or a late charge no greater than the maximum rate allowed by law. Customer acknowledges and agrees that if Customer fails to pay any amounts when due and fails to cure



**Meet Point Networks, LLC**

P.O. Box 339

Bixby, OK 74008

Voice 918-633-6896 - Fax 918-512-4400 - Web [www.meetpointnetworks.com](http://www.meetpointnetworks.com)

such non-payment upon receipt of written notice of non-payment from Meet Point Networks, Customer will be deemed to have terminated this Agreement and will be obligated to pay the termination fee described in Section 5, above. If applicable to the Service, Customer shall pay sales, use, gross receipts, and excise taxes, access fees and all other fees, universal service fund assessments, bypass or other local, state and Federal taxes or charges, and deposits, imposed on the use of the Services. Taxes will be separately stated on Customer's invoice. No interest will be paid on deposits unless required by law.

**5. Service and Installation** Meet Point Networks shall provide Customer with the Services identified on the Cover Page and may provide related facilities and equipment, the ownership of which shall be retained by Meet Point Networks (the "Meet Point Networks Equipment"), or for certain Services, Customer, may purchase equipment from Meet Point Networks ("Customer Purchased Equipment"). Customer is responsible for damage to any facilities or equipment installed or provided by Meet Point Networks (the "Meet Point Networks Equipment"). Customer may use the Services for any lawful purpose, provided that such purpose (a) does not interfere or impair the Meet Point Networks network or Meet Point Networks Equipment and (b) complies with the AUP. Customer shall use the Meet Point Networks Equipment only for the purpose of receiving the Services. Customer shall use Customer Purchased Equipment in accordance with the terms of the related equipment purchase agreement. Unless provided otherwise herein, Meet Point Networks shall use commercially reasonable efforts to maintain the Services in accordance with applicable performance standards.

**Contract is subject to availability of facilities and construction charges.**

**6. General Terms** The General Terms are hereby incorporated into this Agreement by reference. Meet Point Networks, in its sole discretion, may modify, supplement or remove any of the General Terms from time to time, without additional notice to Customer, and any such changes will be effective upon Meet Point Networks publishing such changes on the Meet Point Networks web site. BY EXECUTING THIS AGREEMENT AND/OR USING OR PAYING FOR THE SERVICES, CUSTOMER ACKNOWLEDGES THAT IT HAS READ, UNDERSTOOD, AND AGREED TO BE BOUND BY THE GENERAL TERMS.

**7. LIMITATION OF LIABILITY** MEET POINT NETWORKS AND/OR ITS AGENTS SHALL NOT BE LIABLE FOR DAMAGES FOR FAILURE TO FURNISH OR INTERRUPTION OF ANY SERVICES, NOR SHALL MEET POINT NETWORKS OR ITS AGENTS BE RESPONSIBLE FOR FAILURE OR ERRORS IN SIGNAL TRANSMISSION, LOST DATA, FILES OR SOFTWARE DAMAGE REGARDLESS OF THE CAUSE. MEET POINT NETWORKS SHALL NOT BE LIABLE FOR DAMAGE TO PROPERTY OR FOR INJURY TO ANY PERSON ARISING FROM THE INSTALLATION OR REMOVAL OF EQUIPMENT UNLESS CAUSED BY THE NEGLIGENCE OF MEET POINT NETWORKS. UNDER NO CIRCUMSTANCES WILL MEET POINT NETWORKS BE LIABLE FOR ANY INDIRECT, INCIDENTAL, SPECIAL OR CONSEQUENTIAL DAMAGES, INCLUDING LOST PROFITS, ARISING FROM THIS AGREEMENT OR ITS PROVISION OF THE SERVICES.

**8. WARRANTIES** EXCEPT AS PROVIDED HEREIN, THERE ARE NO OTHER AGREEMENTS, WARRANTIES OR REPRESENTATIONS, EXPRESS OR IMPLIED, EITHER IN FACT OR BY OPERATION OF LAW, STATUTORY OR OTHERWISE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE, RELATING TO THE SERVICES. SERVICES PROVIDED ARE A BEST EFFORTS SERVICE AND MEET POINT NETWORKS DOES NOT WARRANT THAT THE SERVICES, EQUIPMENT OR SOFTWARE SHALL BE ERROR-FREE OR WITHOUT INTERRUPTION. INTERNET SPEEDS WILL VARY. MEET POINT NETWORKS MAKES NO WARRANTY AS TO TRANSMISSION OR UPSTREAM OR DOWNSTREAM SPEEDS OF THE NETWORK.

**9. Public Performance.** If Customer engages in a public performance of any copyrighted material contained in any of the Services, Customer, and not Meet Point Networks, shall be responsible for obtaining any public performing licenses at Customer's expense.

E-Rate Funding Year 2014



SPIN 143015254  
FCC RN 001199307  
MTM – INTERNET ACCESS  
(Month to Month service -- no contract needed)

**GROVE SCHOOL CO DISTRICT 27**

Proposal Contingent upon E-Rate Funding

Internet Access Service	Monthly\$	Annual\$
15mb	\$1,118	\$13,410
20mb	\$1,143	\$13,716

OneNet Internet service provides the connection from your location to our hub site. As part of our standard package OneNet Internet service customers receive: unlimited email services, web hosting, Quality of Service, DNS, unlimited video conferencing and related technical support. *There is no reduction in cost if customer does not utilize any component of the standard package.*

Customer Provided Router

- 15mb-20mb will require router with 2 Fast Ethernet Interfaces; one interface for internet connection and one for LAN

Options

- OneNet Provided Router (ERate Priority One On-Premise Equipment)

\$89 per month for Juniper SRX220. The router shall remain the property of OneNet, therefore OneNet reserves the right to use for other customers. Maintenance of router will be OneNet's responsibility. Customer's local network will not be dependent on the OneNet provided router. (Not Oklahoma Universal Service Fund eligible, customer will pay their percentage after ERate discount.)

- Content Filtering pricing is available upon request. (Not ERate eligible service)

**Proposed By:**

A handwritten signature in black ink, appearing to read "Ami Layman".

Ami Layman

Assistant Director of Administration  
OneNet  
PO Box 108800  
Oklahoma City, OK 73101-8800  
(888) 566-3638

**Accepted By:**

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Date

**If you select OneNet as your provider, please sign and date this with your allowable contract date based on your 470 posting. THIS IS FOR YOUR ERATE RECORDS and Item 21 Attachment.**

**Please contact OneNet when you are ready to order services.**



December 5th 2013

Elizabeth "Libby" Mackey-Perrin

XO Communications

314-787-7604

314-780-5117

[elizabeth.a.perrin@xo.com](mailto:elizabeth.a.perrin@xo.com)

Contracts can be signed anytime  
GROVE SCHOOL

Contracts can be signed anytime and install date will be  
July 1st 2014

CIRCUIT	Quantity of Product											Total	
		NRC	MRC			PORT		ROUTER				NRC	MRC
2800 N BRYAN AVE SHAWNEE, OK 74804													
DIA of Internet 44 Meg	1		\$4,878.30			\$ 400.00		\$ 184.00					\$5,462.30
Includes Router													
Installation included													
Total												\$0.00	\$5,462.30

Term (Months)

36

## Summary of Benefits

Flat rate port charge. No separate Class of Service charges or limits

Simplified WAN management between multiple locations. No need to manage individual virtual connections

Cost savings with converged services

Flexible CPE arrangements with Optional Smart Net can optimize the support arrangement for each customer

Ability to offer Dedicated Internet Access and MPLS on the same access circuit

Secure and private, no Managed Security Firewall required

Cisco TelePresence Certified

Improved Visibility into Applications Performance with XO APM

## Financial Summary

Monthly Cost with XO:

\$5,462.30

Thank you for choosing XO – we value your business and look forward to serving your business telecommunications needs, now and in the future!

*These materials are confidential and proprietary to XO Communications, LLC and its subsidiaries and affiliates (collectively, "XO"). These materials shall not be disclosed in whole or in part for any purpose whatsoever without the prior written consent of XO, except to receiving party's directors, officers, employees and contractors who have a need to know such information, who have been advised of the obligation of confidentiality and are obligated to keep it confidential. XO reserves all copyrights to these materials and all rights to its logo and name as trademarks of XO. These materials are for marketing purposes only and in no way form an offer or contract or commit XO in any manner. Any pricing quoted does not include taxes or fees and is subject to change pending a final contract. This restriction, to the extent not expressly stated, is incorporated by reference and applies in full to the information contained in all materials provided herein.*



**Exhibit 3: 471 Application**

FCC Form 471

Approval by OMB  
3060-0806**Schools and Libraries Universal Service  
Description of Services Ordered and Certification Form 471****Estimated Average Burden Hours per Response: 4 hours**

This form is designed to help schools and libraries to list the eligible services they have ordered and estimate the annual charges for them so that the Fund Administrator can set aside sufficient support to reimburse providers for services.

**Please read instructions before beginning this application. (You can also file online at [www.usac.org/sl](http://www.usac.org/sl).)****The instructions include information on the deadlines for filing this application.**

Applicant's Form Identifier (Create an identifier for your own reference)		Form 471 Application #:
GROVE Y17		951256 (To be assigned by administrator)
<b>Block 1: Billed Entity Address and Identifications</b>		
<b>1</b> Name of Billed Entity GROVE SCHOOL CO DISTRICT 27		
<b>2</b> Funding Year 2014		
<b>3a</b> Entity Number 140323		
<b>3b</b> FCC Registration Number 0012038089		
<b>4a</b> Street Address, P.O. Box, or Route Number 2800 N BRYAN RD		
City SHAWNEE State OK Zip Code 74801-2309		
<b>4b</b> Telephone Number (405) 275-7435		
<b>4c</b> Fax Number (405) 273-2541		
<b>5a</b> Type of Application (check only one) <input type="radio"/> Individual School (individual public or non-public school) <input checked="" type="radio"/> School District (LEA; public or non-public [e.g. diocesan] local district representing multiple schools) <input type="radio"/> Library (including library system, library outlet/branch or library consortium as defined under LSTA) <input type="radio"/> Consortium (intermediate service agencies, states, state networks, special consortia of schools and/or libraries) <input type="radio"/> Statewide application for (enter 2-letter state code) representing (check all that apply) <input type="checkbox"/> All public schools/districts in the state <input type="checkbox"/> All non-public schools in the state <input type="checkbox"/> All libraries in the state		
<b>5b</b> Recipient(s) of Services: <input type="checkbox"/> Private <input checked="" type="checkbox"/> Public <input type="checkbox"/> Charter <input type="checkbox"/> Tribal <input type="checkbox"/> Head Start <input type="checkbox"/> State Agency		
<b>Entity Number: 140323</b>		<b>Applicant's Form Identifier: GROVE Y17</b>
<b>Contact Person: Chris Webber or Karla Hall</b>		<b>Contact Phone Number: (918) 445-0048</b>
<b>Block 1: Billed Entity Address and Identifications (continued)</b>		
<b>6a</b> Contact Person's Name Chris Webber or Karla Hall		
If the Contact Person's Street Address is the same as <b>Item 4</b> above, check here. <input type="checkbox"/> If not, complete Item 6b.		
<b>6b</b> Street Address, P.O. Box, or Route Number NOTE: USAC will use this address to mail correspondence about this form. PO Box 701713  City Tulsa State OK Zip Code 74170-1713		
Check the box next to your preferred mode of contact and provide your contact information. One box <b>MUST</b> be checked and an entry provided.		
<input type="checkbox"/> <b>6c</b> Telephone Number (918) 445 - 0048		
<input type="checkbox"/> <b>6d</b> Fax Number (918) 445 - 0049		
<input checked="" type="checkbox"/> <b>6e</b> E-Mail Address INFO@CRWCONSULTING.COM Re-enter E-mail Address INFO@CRWCONSULTING.COM		
<b>6f</b> Holiday/vacation/summer contact information: please include name of alternate contact (if applicable) and alternate phone, fax or E-mail address		
If a consultant is assisting you with your application process, please complete Item 6g below:		
<b>6g</b> Consultant Name Chris Webber Name of Consultant's Employer CRW Consulting Consultant's Street Address CRW Consulting PO Box 701713 City Tulsa State OK Zip Code 74170 Consultant's Telephone Number (918) 445-0048 Ext. Consultant's Fax Number (918) 445-0049 Consultant's E-mail Address info@crwconsulting.com Re-enter E-mail Address info@crwconsulting.com Consultant Registration Number 16024800		
<b>Blocks 2 and 3 [Reserved]</b>		



<b>Entity Number: 140323</b>										<b>Applicant's Form Identifier: GROVE Y17</b>				
<b>Contact Person: Chris Webber or Karla Hall</b>										<b>Contact Phone Number: (918) 445-0048</b>				
<b>Block 4: Discount Calculation Worksheet</b>												<b>Worksheet - 1643427</b>		
<b>Page 1 of 1</b>														
<p>The Block 4 worksheet is used to calculate your discount for services. You will complete one or more worksheets depending on the type of application you are filing. If you file more than one worksheet, please number the completed worksheets to assure that they are all processed correctly. Please refer to the instructions for information specific to the Type of Application you indicated in Block 1, Item 5.</p> <p><input type="checkbox"/> Check here if this worksheet contains all eligible entities in the school district or library system.</p>														
9a List entities and calculate discount(s):												(For Administrator's Use)		
<b>School District or Library System Name:</b>												<b>School District or Library System Entity Number:</b>		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Name of Eligible Entity	Entity Number AND NCES Code (for Schools) or FSCS Code (for Libraries)	Urban or Rural U or R	Total Number of Students	Number of Students Eligible for NSLP	Percent of Students Eligible for NSLP (Col. 5 / Col. 4)	Disc. from Disc. Matrix	New Construction	Admin Entity or NIF	Alt Disc Mech	Weighted Product for Calculating Shared Discount (Col. 4 x Col. 7)	Insert appropriate codes(s): P= pre-K, H = Head Start, A = Adult Education, J = Juvenile Justice Center, E = ESA, D = Dormitory	Entity Number of School District in which Library Outlet/Branch is Located	Discount of Member Entity	Shared Discount
ALL ENTITIES			SCHOOLS AND LIBRARIES							Schools with shared services	Schools	Library Outlet/Branch	Consortia	
GROVE ELEMENTARY SCHOOL	85169 40 13500 105	U	393	96	24.427%	50	N	N	N	19650	P			
9b Shared Services														
SCHOOL DISTRICTS: (Including groups of schools within school districts.) Calculate the totals of Columns 4 and 11. Divide the total of Column 11 by the total of Column 4. Enter the result in Column 15.			393							19650				50%
LIBRARY SYSTEMS: Calculate the total of Column 7. Divide this total by the number of outlets/branches. Enter the result in Column 15.														
CONSORTIA: Calculate the total of Column 14. Divide this total by the number of member entities. Enter the result in Column 15.														

<b>Entity Number:</b> 140323		<b>Applicant's Form Identifier:</b> GROVE Y17																												
<b>Contact Person:</b> Chris Webber or Karla Hall		<b>Contact Phone Number:</b> (918) 445-0048																												
<b>Block 5: Discount Funding Request(s)</b>		<b>Block 5, page 1 of 6</b>																												
<b>Instructions:</b> Use one Block 5 page for EACH service (Funding Request Number) for which you are requesting discounts. Make as many copies of this page as needed, and number the completed pages to assure that they are all processed correctly.		FRN 2586865 (to be assigned by administrator)																												
10 <input type="checkbox"/> If this is a duplicate Funding Request (e.g., of an FRN that is not yet approved, under appeal, etc.), check this box and enter the original FRN in the space provided:																														
<b>11 Category of Service</b> ( only ONE category should be checked) <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <b>PRIORITY 1</b>  <input type="checkbox"/> Telecommunications Service  <input checked="" type="checkbox"/> Internet Access         </td> <td style="width: 50%; vertical-align: top;"> <b>PRIORITY 2</b>  <input type="checkbox"/> Internal Connections Other than Basic Maintenance  <input type="checkbox"/> Basic Maintenance of Internal Connections         </td> </tr> </table>		<b>PRIORITY 1</b> <input type="checkbox"/> Telecommunications Service <input checked="" type="checkbox"/> Internet Access	<b>PRIORITY 2</b> <input type="checkbox"/> Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections	<b>23 Calculations</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td rowspan="5" style="width: 10%; text-align: center; vertical-align: middle;">Recurring Charges</td> <td style="width: 50%;"><b>A. Monthly charges</b> (total amount per month for service)</td> <td style="width: 40%; text-align: right;">\$62.99</td> </tr> <tr> <td><b>B. How much of the amount in A is ineligible?</b></td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td><b>C. Eligible monthly pre-discount amount</b> (A minus B)</td> <td style="text-align: right;">\$62.99</td> </tr> <tr> <td><b>D. Number of months service provided in funding year</b></td> <td style="text-align: right;">12</td> </tr> <tr> <td><b>E. Annual pre-discount amount for eligible recurring charges</b> (C x D)</td> <td style="text-align: right;">\$755.88</td> </tr> <tr> <td rowspan="4" style="text-align: center; vertical-align: middle;">Non-Recurring Charges</td> <td><b>F. Annual non-recurring charges</b></td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td><b>G. How much of the amount in F is ineligible?</b></td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td><b>H. Annual eligible pre-discount amount for non-recurring charges</b> (F minus G)</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td><b>I. Total funding year pre-discount amount</b> (E + H)</td> <td style="text-align: right;">\$755.88</td> </tr> <tr> <td rowspan="2" style="text-align: center; vertical-align: middle;">Total Charges</td> <td><b>J. Discount from Block 4 Worksheet</b></td> <td style="text-align: right;">50.00</td> </tr> <tr> <td><b>K. Funding Commitment Request</b> (I x J)</td> <td style="text-align: right;">\$377.94</td> </tr> </table>		Recurring Charges	<b>A. Monthly charges</b> (total amount per month for service)	\$62.99	<b>B. How much of the amount in A is ineligible?</b>	\$0.00	<b>C. Eligible monthly pre-discount amount</b> (A minus B)	\$62.99	<b>D. Number of months service provided in funding year</b>	12	<b>E. Annual pre-discount amount for eligible recurring charges</b> (C x D)	\$755.88	Non-Recurring Charges	<b>F. Annual non-recurring charges</b>	\$0.00	<b>G. How much of the amount in F is ineligible?</b>	\$0.00	<b>H. Annual eligible pre-discount amount for non-recurring charges</b> (F minus G)	\$0.00	<b>I. Total funding year pre-discount amount</b> (E + H)	\$755.88	Total Charges	<b>J. Discount from Block 4 Worksheet</b>	50.00	<b>K. Funding Commitment Request</b> (I x J)	\$377.94
<b>PRIORITY 1</b> <input type="checkbox"/> Telecommunications Service <input checked="" type="checkbox"/> Internet Access	<b>PRIORITY 2</b> <input type="checkbox"/> Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections																													
Recurring Charges	<b>A. Monthly charges</b> (total amount per month for service)	\$62.99																												
	<b>B. How much of the amount in A is ineligible?</b>	\$0.00																												
	<b>C. Eligible monthly pre-discount amount</b> (A minus B)	\$62.99																												
	<b>D. Number of months service provided in funding year</b>	12																												
	<b>E. Annual pre-discount amount for eligible recurring charges</b> (C x D)	\$755.88																												
Non-Recurring Charges	<b>F. Annual non-recurring charges</b>	\$0.00																												
	<b>G. How much of the amount in F is ineligible?</b>	\$0.00																												
	<b>H. Annual eligible pre-discount amount for non-recurring charges</b> (F minus G)	\$0.00																												
	<b>I. Total funding year pre-discount amount</b> (E + H)	\$755.88																												
Total Charges	<b>J. Discount from Block 4 Worksheet</b>	50.00																												
	<b>K. Funding Commitment Request</b> (I x J)	\$377.94																												
<b>12 Form 470 Application Number</b> 248700001161457																														
<b>13 SPIN – Service Provider Identification Number</b> 143025240																														
<b>14 Service Provider Name</b> AT&T Mobility																														
<b>15a</b> <input checked="" type="checkbox"/> Check this box if this Funding Request is for non-contracted tariffed or month-to-month services.																														
<b>15b Contract Number</b> MTM																														
<b>15c</b> <input type="checkbox"/> Check this box if this Funding Request is covered under a master contract (a contract negotiated by a third party, the terms and conditions of which are then made available to an eligible entity that purchases directly from the service provider). <b>15d</b> <input type="checkbox"/> Check this box if this Funding Request is a continuation of an FRN from a previous funding year based on a multi-year contract. If so, provide that FRN here:																														
<b>16a Billing Account Number</b> (e.g., billed telephone number)																														
<b>16b</b> <input type="checkbox"/> Check this box if there are multiple Billing Account Numbers and attach a complete list of those numbers to this page.																														
<b>17 Allowable Vendor Selection/Contract Date (mm/dd/yyyy)</b> (based on Form 470 filing) 12/04/2013																														
<b>18 Contract Award Date (mm/dd/yyyy)</b>																														
<b>19 Service Start Date (mm/dd/yyyy)</b> 07/01/2014																														
<b>20a Service End Date (mm/dd/yyyy)</b> 06/30/2015																														
<b>20b Contract Expiration Date (mm/dd/yyyy)</b>																														
<b>21 Description of This Service:</b> NOTE: All Item 21 Attachments must be filed before the close of the filing window. Attachment You MUST attach a description of the service, including a breakdown of components, costs, manufacturer name, make and model number. You must include any additional account or telephone numbers if the billed account has multiple numbers. Label the description with an Attachment Number, and note number in space provided.																														
<b>22 Entity/Entities Receiving This Service:</b>		a. If the service is site-specific (provided to one site and not shared by others), list the Entity Number of the entity from Block 4 receiving this service: 85169 b. If the service is shared by all entities on a Block 4 worksheet, list the worksheet number (e.g., 1):																												

<b>Entity Number:</b> 140323	<b>Applicant's Form Identifier:</b> GROVE Y17
<b>Contact Person:</b> Chris Webber or Karla Hall	<b>Contact Phone Number:</b> (918) 445-0048

**Block 5 (Continued):**

**24 Description of Broadband and other Connectivity Services Ordered for Schools and Libraries from this funding request**

☐ Complete the information below for this funding request only if requesting **Telecommunications Services** or **Internet Access** for the purpose of providing broadband and other types of connectivity to school and/or library facilities.

☐ Check this box if this request is for services or equipment that do **not** provide broadband or connectivity. For instance, check the box if this funding request is for internal connections, basic maintenance, or requests for services like e-mail or phone service.

**a** Which technology(ies) and speed(s) are being provided in this Funding Request? Please list the number of lines and average download speed for the lines included in this funding request. If there are multiple download speeds for the lines within one type of broadband connection, this form provides two additional lines per broadband connection category. If you need additional space, please make copies of this page and number the completed pages to assure that they are all processed correctly. A response to this item is not a substitute for a complete response to Item 21 but should be consistent with the description of services in the response to Item 21. Please ask your service provider if you need assistance.

Type of Connection	Number of lines included in this FRN	Download speed per line in Mbps
Cellular Wireless	4	1

**b** If the Internet service is available to students or patrons in more than just a single location or office, please indicate:

1.	If the access is provided by wired connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to wired drops? <u>100</u> %
2.	If the access is provided by Wi-Fi connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to a Wi-Fi signal? <u>100</u> %

**c** For consortia and statewide applications, do the connections in this FRN include the last mile connection to the school or library? ☐ Yes ☐ No  
If **no** above, are these connections only for backbone connections? ☐ Yes ☐ No

<b>Entity Number:</b> 140323		<b>Applicant's Form Identifier:</b> GROVE Y17																																								
<b>Contact Person:</b> Chris Webber or Karla Hall		<b>Contact Phone Number:</b> (918) 445-0048																																								
<b>Block 5: Discount Funding Request(s)</b>		<b>Block 5, page 2 of 6</b>																																								
<b>Instructions:</b> Use one Block 5 page for EACH service (Funding Request Number) for which you are requesting discounts. Make as many copies of this page as needed, and number the completed pages to assure that they are all processed correctly.		FRN 2586873 (to be assigned by administrator)																																								
10 <input type="checkbox"/> If this is a duplicate Funding Request (e.g., of an FRN that is not yet approved, under appeal, etc.), check this box and enter the original FRN in the space provided:																																										
<b>11 Category of Service</b> ( only ONE category should be checked)		<b>23 Calculations</b>																																								
<table border="1"> <tr> <td><b>PRIORITY 1</b></td> <td><b>PRIORITY 2</b></td> </tr> <tr> <td><input checked="" type="checkbox"/> Telecommunications Service</td> <td><input type="checkbox"/> Internal Connections Other than Basic Maintenance</td> </tr> <tr> <td><input type="checkbox"/> Internet Access</td> <td><input type="checkbox"/> Basic Maintenance of Internal Connections</td> </tr> </table>		<b>PRIORITY 1</b>	<b>PRIORITY 2</b>	<input checked="" type="checkbox"/> Telecommunications Service	<input type="checkbox"/> Internal Connections Other than Basic Maintenance	<input type="checkbox"/> Internet Access	<input type="checkbox"/> Basic Maintenance of Internal Connections	<table border="1"> <tr> <td rowspan="5">Recurring Charges</td> <td><b>A. Monthly charges</b> (total amount per month for service)</td> </tr> <tr> <td>\$224.62</td> </tr> <tr> <td><b>B. How much of the amount in A is ineligible?</b></td> </tr> <tr> <td>\$0.00</td> </tr> <tr> <td><b>C. Eligible monthly pre-discount amount</b> (A minus B)</td> </tr> <tr> <td></td> <td>\$224.62</td> </tr> <tr> <td></td> <td><b>D. Number of months service provided in funding year</b></td> </tr> <tr> <td></td> <td>12</td> </tr> <tr> <td></td> <td><b>E. Annual pre-discount amount for eligible recurring charges</b> (C x D)</td> </tr> <tr> <td></td> <td>\$2,695.44</td> </tr> <tr> <td rowspan="4">Non-Recurring Charges</td> <td><b>F. Annual non-recurring charges</b></td> </tr> <tr> <td>\$0.00</td> </tr> <tr> <td><b>G. How much of the amount in F is ineligible?</b></td> </tr> <tr> <td>\$0.00</td> </tr> <tr> <td></td> <td><b>H. Annual eligible pre-discount amount for non-recurring charges</b> (F minus G)</td> </tr> <tr> <td></td> <td>\$0.00</td> </tr> <tr> <td rowspan="3">Total Charges</td> <td><b>I. Total funding year pre-discount amount</b> (E + H)</td> </tr> <tr> <td>\$2,695.44</td> </tr> <tr> <td><b>J. Discount from Block 4 Worksheet</b> 50.00</td> </tr> <tr> <td></td> <td><b>K. Funding Commitment Request</b> (I x J)</td> </tr> <tr> <td></td> <td>\$1,347.72</td> </tr> </table>		Recurring Charges	<b>A. Monthly charges</b> (total amount per month for service)	\$224.62	<b>B. How much of the amount in A is ineligible?</b>	\$0.00	<b>C. Eligible monthly pre-discount amount</b> (A minus B)		\$224.62		<b>D. Number of months service provided in funding year</b>		12		<b>E. Annual pre-discount amount for eligible recurring charges</b> (C x D)		\$2,695.44	Non-Recurring Charges	<b>F. Annual non-recurring charges</b>	\$0.00	<b>G. How much of the amount in F is ineligible?</b>	\$0.00		<b>H. Annual eligible pre-discount amount for non-recurring charges</b> (F minus G)		\$0.00	Total Charges	<b>I. Total funding year pre-discount amount</b> (E + H)	\$2,695.44	<b>J. Discount from Block 4 Worksheet</b> 50.00		<b>K. Funding Commitment Request</b> (I x J)		\$1,347.72
<b>PRIORITY 1</b>	<b>PRIORITY 2</b>																																									
<input checked="" type="checkbox"/> Telecommunications Service	<input type="checkbox"/> Internal Connections Other than Basic Maintenance																																									
<input type="checkbox"/> Internet Access	<input type="checkbox"/> Basic Maintenance of Internal Connections																																									
Recurring Charges	<b>A. Monthly charges</b> (total amount per month for service)																																									
	\$224.62																																									
	<b>B. How much of the amount in A is ineligible?</b>																																									
	\$0.00																																									
	<b>C. Eligible monthly pre-discount amount</b> (A minus B)																																									
	\$224.62																																									
	<b>D. Number of months service provided in funding year</b>																																									
	12																																									
	<b>E. Annual pre-discount amount for eligible recurring charges</b> (C x D)																																									
	\$2,695.44																																									
Non-Recurring Charges	<b>F. Annual non-recurring charges</b>																																									
	\$0.00																																									
	<b>G. How much of the amount in F is ineligible?</b>																																									
	\$0.00																																									
	<b>H. Annual eligible pre-discount amount for non-recurring charges</b> (F minus G)																																									
	\$0.00																																									
Total Charges	<b>I. Total funding year pre-discount amount</b> (E + H)																																									
	\$2,695.44																																									
	<b>J. Discount from Block 4 Worksheet</b> 50.00																																									
	<b>K. Funding Commitment Request</b> (I x J)																																									
	\$1,347.72																																									
<b>12 Form 470 Application Number</b> 248700001161457																																										
<b>13 SPIN – Service Provider Identification Number</b> 143004662																																										
<b>14 Service Provider Name</b> Southwestern Bell Telephone Company																																										
<b>15a</b> <input checked="" type="checkbox"/> Check this box if this Funding Request is for non-contracted tariffed or month-to-month services.																																										
<b>15b Contract Number</b> MTM																																										
<b>15c</b> <input type="checkbox"/> Check this box if this Funding Request is covered under a master contract (a contract negotiated by a third party, the terms and conditions of which are then made available to an eligible entity that purchases directly from the service provider).																																										
<b>15d</b> <input type="checkbox"/> Check this box if this Funding Request is a continuation of an FRN from a previous funding year based on a multi-year contract. If so, provide that FRN here:																																										
<b>16a Billing Account Number</b> (e.g., billed telephone number)																																										
<b>16b</b> <input type="checkbox"/> Check this box if there are multiple Billing Account Numbers and attach a complete list of those numbers to this page.																																										
<b>17 Allowable Vendor Selection/Contract Date (mm/dd/yyyy)</b> (based on Form 470 filing) 12/04/2013																																										
<b>18 Contract Award Date (mm/dd/yyyy)</b>																																										
<b>19 Service Start Date (mm/dd/yyyy)</b> 07/01/2014																																										
<b>20a Service End Date (mm/dd/yyyy)</b> 06/30/2015																																										
<b>20b Contract Expiration Date</b> (mm/dd/yyyy)																																										
<b>21 Description of This Service: NOTE: All Item 21 Attachments must be filed before the close of the filing window. Attachment</b> You MUST attach a description of the service, including a breakdown of components, costs, manufacturer name, make and model number. You must include any additional account or telephone numbers if the billed account has multiple numbers. Label the description with an Attachment Number, and note number in space provided.																																										
<b>22 Entity/Entities Receiving This Service:</b>		a. If the service is site-specific (provided to one site and not shared by others), list the Entity Number of the entity from Block 4 receiving this service: 85169 b. If the service is shared by all entities on a Block 4 worksheet, list the worksheet number (e.g., 1):																																								

Entity Number: 140323	Applicant's Form Identifier: GROVE Y17
Contact Person: Chris Webber or Karla Hall	Contact Phone Number: (918) 445-0048

**Block 5 (Continued):**

**24 Description of Broadband and other Connectivity Services Ordered for Schools and Libraries from this funding request**

☐ Complete the information below for this funding request only if requesting **Telecommunications Services** or **Internet Access** for the purpose of providing broadband and other types of connectivity to school and/or library facilities.

☒ Check this box if this request is for services or equipment that do **not** provide broadband or connectivity. For instance, check the box if this funding request is for internal connections, basic maintenance, or requests for services like e-mail or phone service.

**a** Which technology(ies) and speed(s) are being provided in this Funding Request? Please list the number of lines and average download speed for the lines included in this funding request. If there are multiple download speeds for the lines within one type of broadband connection, this form provides two additional lines per broadband connection category. If you need additional space, please make copies of this page and number the completed pages to assure that they are all processed correctly. A response to this item is not a substitute for a complete response to Item 21 but should be consistent with the description of services in the response to Item 21. Please ask your service provider if you need assistance.

Type of Connection	Number of lines included in this FRN	Download speed per line in Mbps

**b** If the Internet service is available to students or patrons in more than just a single location or office, please indicate:

1.	If the access is provided by wired connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to wired drops? ____%
2.	If the access is provided by Wi-Fi connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to a Wi-Fi signal? ____%

**c** For consortia and statewide applications, do the connections in this FRN include the last mile connection to the school or library? ☐ Yes ☐ No  
 If no above, are these connections only for backbone connections? ☐ Yes ☐ No

<b>Entity Number:</b> 140323		<b>Applicant's Form Identifier:</b> GROVE Y17																												
<b>Contact Person:</b> Chris Webber or Karla Hall		<b>Contact Phone Number:</b> (918) 445-0048																												
<b>Block 5: Discount Funding Request(s)</b>		<b>Block 5, page 3 of 6</b>																												
<b>Instructions:</b> Use one Block 5 page for EACH service (Funding Request Number) for which you are requesting discounts. Make as many copies of this page as needed, and number the completed pages to assure that they are all processed correctly.		FRN 2586875 (to be assigned by administrator)																												
10 <input type="checkbox"/> If this is a duplicate Funding Request (e.g., of an FRN that is not yet approved, under appeal, etc.), check this box and enter the original FRN in the space provided:																														
<b>11 Category of Service</b> ( only ONE category should be checked) <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <b>PRIORITY 1</b>  <input checked="" type="checkbox"/> Telecommunications Service  <input type="checkbox"/> Internet Access         </td> <td style="width: 50%; vertical-align: top;"> <b>PRIORITY 2</b>  <input type="checkbox"/> Internal Connections Other than Basic Maintenance  <input type="checkbox"/> Basic Maintenance of Internal Connections         </td> </tr> </table>		<b>PRIORITY 1</b> <input checked="" type="checkbox"/> Telecommunications Service <input type="checkbox"/> Internet Access	<b>PRIORITY 2</b> <input type="checkbox"/> Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections	<b>23 Calculations</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td rowspan="5" style="width: 10%; text-align: center; vertical-align: middle;">Recurring Charges</td> <td style="width: 10%;"><b>A.</b> Monthly charges (total amount per month for service)</td> <td style="width: 80%;">\$48.33</td> </tr> <tr> <td><b>B.</b> How much of the amount in A is ineligible?</td> <td>\$0.00</td> </tr> <tr> <td><b>C.</b> Eligible monthly pre-discount amount (A minus B)</td> <td>\$48.33</td> </tr> <tr> <td><b>D.</b> Number of months service provided in funding year</td> <td>12</td> </tr> <tr> <td><b>E.</b> Annual pre-discount amount for eligible recurring charges (C x D)</td> <td>\$579.96</td> </tr> <tr> <td rowspan="4" style="text-align: center; vertical-align: middle;">Non-Recurring Charges</td> <td><b>F.</b> Annual non-recurring charges</td> <td>\$0.00</td> </tr> <tr> <td><b>G.</b> How much of the amount in F is ineligible?</td> <td>\$0.00</td> </tr> <tr> <td><b>H.</b> Annual eligible pre-discount amount for non-recurring charges (F minus G)</td> <td>\$0.00</td> </tr> <tr> <td><b>I.</b> Total funding year pre-discount amount (E + H)</td> <td>\$579.96</td> </tr> <tr> <td rowspan="2" style="text-align: center; vertical-align: middle;">Total Charges</td> <td><b>J.</b> Discount from Block 4 Worksheet</td> <td>50.00</td> </tr> <tr> <td><b>K.</b> Funding Commitment Request (I x J)</td> <td>\$289.98</td> </tr> </table>		Recurring Charges	<b>A.</b> Monthly charges (total amount per month for service)	\$48.33	<b>B.</b> How much of the amount in A is ineligible?	\$0.00	<b>C.</b> Eligible monthly pre-discount amount (A minus B)	\$48.33	<b>D.</b> Number of months service provided in funding year	12	<b>E.</b> Annual pre-discount amount for eligible recurring charges (C x D)	\$579.96	Non-Recurring Charges	<b>F.</b> Annual non-recurring charges	\$0.00	<b>G.</b> How much of the amount in F is ineligible?	\$0.00	<b>H.</b> Annual eligible pre-discount amount for non-recurring charges (F minus G)	\$0.00	<b>I.</b> Total funding year pre-discount amount (E + H)	\$579.96	Total Charges	<b>J.</b> Discount from Block 4 Worksheet	50.00	<b>K.</b> Funding Commitment Request (I x J)	\$289.98
<b>PRIORITY 1</b> <input checked="" type="checkbox"/> Telecommunications Service <input type="checkbox"/> Internet Access	<b>PRIORITY 2</b> <input type="checkbox"/> Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections																													
Recurring Charges	<b>A.</b> Monthly charges (total amount per month for service)	\$48.33																												
	<b>B.</b> How much of the amount in A is ineligible?	\$0.00																												
	<b>C.</b> Eligible monthly pre-discount amount (A minus B)	\$48.33																												
	<b>D.</b> Number of months service provided in funding year	12																												
	<b>E.</b> Annual pre-discount amount for eligible recurring charges (C x D)	\$579.96																												
Non-Recurring Charges	<b>F.</b> Annual non-recurring charges	\$0.00																												
	<b>G.</b> How much of the amount in F is ineligible?	\$0.00																												
	<b>H.</b> Annual eligible pre-discount amount for non-recurring charges (F minus G)	\$0.00																												
	<b>I.</b> Total funding year pre-discount amount (E + H)	\$579.96																												
Total Charges	<b>J.</b> Discount from Block 4 Worksheet	50.00																												
	<b>K.</b> Funding Commitment Request (I x J)	\$289.98																												
<b>12 Form 470 Application Number</b> 248700001161457																														
<b>13 SPIN – Service Provider Identification Number</b> 143008823																														
<b>14 Service Provider Name</b> SBC Long Distance, LLC.																														
<b>15a</b> <input checked="" type="checkbox"/> Check this box if this Funding Request is for non-contracted tariffed or month-to-month services.																														
<b>15b Contract Number</b> MTM																														
<b>15c</b> <input type="checkbox"/> Check this box if this Funding Request is covered under a master contract (a contract negotiated by a third party, the terms and conditions of which are then made available to an eligible entity that purchases directly from the service provider). <b>15d</b> <input type="checkbox"/> Check this box if this Funding Request is a continuation of an FRN from a previous funding year based on a multi-year contract. If so, provide that FRN here:																														
<b>16a Billing Account Number</b> (e.g., billed telephone number)																														
<b>16b</b> <input type="checkbox"/> Check this box if there are multiple Billing Account Numbers and attach a complete list of those numbers to this page.																														
<b>17 Allowable Vendor Selection/Contract Date (mm/dd/yyyy)</b> (based on Form 470 filing) 12/04/2013																														
<b>18 Contract Award Date (mm/dd/yyyy)</b>																														
<b>19 Service Start Date (mm/dd/yyyy)</b> 07/01/2014																														
<b>20a Service End Date (mm/dd/yyyy)</b> 06/30/2015																														
<b>20b Contract Expiration Date</b> (mm/dd/yyyy)																														
<b>21 Description of This Service: NOTE: All Item 21 Attachments must be filed before the close of the filing window. Attachment</b> You MUST attach a description of the service, including a breakdown of components, costs, manufacturer name, make and model number. You must include any additional account or telephone numbers if the billed account has multiple numbers. Label the description with an Attachment Number, and note number in space provided. <div style="text-align: right;">2</div>																														
<b>22 Entity/Entities Receiving This Service:</b>		a. If the service is site-specific (provided to one site and not shared by others), list the Entity Number of the entity from Block 4 receiving this service: 85169 b. If the service is shared by all entities on a Block 4 worksheet, list the worksheet number (e.g., 1):																												

Entity Number: 140323	Applicant's Form Identifier: GROVE Y17
Contact Person: Chris Webber or Karla Hall	Contact Phone Number: (918) 445-0048

**Block 5 (Continued):**

**24 Description of Broadband and other Connectivity Services Ordered for Schools and Libraries from this funding request**

☐

Complete the information below for this funding request only if requesting **Telecommunications Services** or **Internet Access** for the purpose of providing broadband and other types of connectivity to school and/or library facilities.

☒

Check this box if this request is for services or equipment that do **not** provide broadband or connectivity. For instance, check the box if this funding request is for internal connections, basic maintenance, or requests for services like e-mail or phone service.

**a**

Which technology(ies) and speed(s) are being provided in this Funding Request? Please list the number of lines and average download speed for the lines included in this funding request. If there are multiple download speeds for the lines within one type of broadband connection, this form provides two additional lines per broadband connection category. If you need additional space, please make copies of this page and number the completed pages to assure that they are all processed correctly. A response to this item is not a substitute for a complete response to Item 21 but should be consistent with the description of services in the response to Item 21. Please ask your service provider if you need assistance.

Type of Connection	Number of lines included in this FRN	Download speed per line in Mbps

**b**

If the Internet service is available to students or patrons in more than just a single location or office, please indicate:

1.	If the access is provided by wired connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to wired drops? ____%
2.	If the access is provided by Wi-Fi connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to a Wi-Fi signal? ____%

**c**

For consortia and statewide applications, do the connections in this FRN include the last mile connection to the school or library? ☐ Yes ☐ No  
If no above, are these connections only for backbone connections? ☐ Yes ☐ No

<b>Entity Number:</b> 140323		<b>Applicant's Form Identifier:</b> GROVE Y17																	
<b>Contact Person:</b> Chris Webber or Karla Hall		<b>Contact Phone Number:</b> (918) 445-0048																	
<b>Block 5: Discount Funding Request(s)</b> <b>Instructions:</b> Use one Block 5 page for EACH service (Funding Request Number) for which you are requesting discounts. Make as many copies of this page as needed, and number the completed pages to assure that they are all processed correctly.		<b>Block 5, page 4 of 6</b>  FRN 2586885 (to be assigned by administrator)																	
<b>10</b> <input type="checkbox"/> If this is a duplicate Funding Request (e.g., of an FRN that is not yet approved, under appeal, etc.), check this box and enter the original FRN in the space provided:																			
<b>11 Category of Service</b> ( only ONE category should be checked) <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <b>PRIORITY 1</b>  <input type="checkbox"/> Telecommunications Service  <input checked="" type="checkbox"/> Internet Access         </td> <td style="width: 50%; vertical-align: top;"> <b>PRIORITY 2</b>  <input type="checkbox"/> Internal Connections Other than Basic Maintenance  <input type="checkbox"/> Basic Maintenance of Internal Connections         </td> </tr> </table>		<b>PRIORITY 1</b> <input type="checkbox"/> Telecommunications Service <input checked="" type="checkbox"/> Internet Access	<b>PRIORITY 2</b> <input type="checkbox"/> Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections	<b>23 Calculations</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td rowspan="5" style="width: 50%; text-align: center; vertical-align: middle;">Recurring Charges</td> <td style="width: 50%;"> <b>A. Monthly charges</b> (total amount per month for service)             \$4,132.50         </td> </tr> <tr> <td> <b>B. How much of the amount in A is ineligible?</b>             \$0.00         </td> </tr> <tr> <td> <b>C. Eligible monthly pre-discount amount</b> (A minus B)             \$4,132.50         </td> </tr> <tr> <td> <b>D. Number of months service provided in funding year</b>             12         </td> </tr> <tr> <td> <b>E. Annual pre-discount amount for eligible recurring charges</b> (C x D)             \$49,590.00         </td> </tr> <tr> <td rowspan="3" style="text-align: center; vertical-align: middle;">Non-Recurring Charges</td> <td> <b>F. Annual non-recurring charges</b>             \$500.00         </td> </tr> <tr> <td> <b>G. How much of the amount in F is ineligible?</b>             \$0.00         </td> </tr> <tr> <td> <b>H. Annual eligible pre-discount amount for non-recurring charges</b> (F minus G)             \$500.00         </td> </tr> <tr> <td rowspan="3" style="text-align: center; vertical-align: middle;">Total Charges</td> <td> <b>I. Total funding year pre-discount amount</b> (E + H)             \$50,090.00         </td> </tr> <tr> <td> <b>J. Discount from Block 4 Worksheet</b>      50.00         </td> </tr> <tr> <td> <b>K. Funding Commitment Request</b> (I x J)            \$25,045.00         </td> </tr> </table>		Recurring Charges	<b>A. Monthly charges</b> (total amount per month for service)  \$4,132.50	<b>B. How much of the amount in A is ineligible?</b>  \$0.00	<b>C. Eligible monthly pre-discount amount</b> (A minus B)  \$4,132.50	<b>D. Number of months service provided in funding year</b>  12	<b>E. Annual pre-discount amount for eligible recurring charges</b> (C x D)  \$49,590.00	Non-Recurring Charges	<b>F. Annual non-recurring charges</b>  \$500.00	<b>G. How much of the amount in F is ineligible?</b>  \$0.00	<b>H. Annual eligible pre-discount amount for non-recurring charges</b> (F minus G)  \$500.00	Total Charges	<b>I. Total funding year pre-discount amount</b> (E + H)  \$50,090.00	<b>J. Discount from Block 4 Worksheet</b> 50.00	<b>K. Funding Commitment Request</b> (I x J) \$25,045.00
<b>PRIORITY 1</b> <input type="checkbox"/> Telecommunications Service <input checked="" type="checkbox"/> Internet Access	<b>PRIORITY 2</b> <input type="checkbox"/> Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections																		
Recurring Charges	<b>A. Monthly charges</b> (total amount per month for service)  \$4,132.50																		
	<b>B. How much of the amount in A is ineligible?</b>  \$0.00																		
	<b>C. Eligible monthly pre-discount amount</b> (A minus B)  \$4,132.50																		
	<b>D. Number of months service provided in funding year</b>  12																		
	<b>E. Annual pre-discount amount for eligible recurring charges</b> (C x D)  \$49,590.00																		
Non-Recurring Charges	<b>F. Annual non-recurring charges</b>  \$500.00																		
	<b>G. How much of the amount in F is ineligible?</b>  \$0.00																		
	<b>H. Annual eligible pre-discount amount for non-recurring charges</b> (F minus G)  \$500.00																		
Total Charges	<b>I. Total funding year pre-discount amount</b> (E + H)  \$50,090.00																		
	<b>J. Discount from Block 4 Worksheet</b> 50.00																		
	<b>K. Funding Commitment Request</b> (I x J) \$25,045.00																		
<b>12 Form 470 Application Number</b> 248700001161457																			
<b>13 SPIN – Service Provider Identification Number</b> 143035519																			
<b>14 Service Provider Name</b>  Meet Point Networks LLC																			
<b>15a</b> <input type="checkbox"/> Check this box if this Funding Request is for non-contracted tariffed or month-to-month services.																			
<b>15b Contract Number</b> N/A																			
<b>15c</b> <input type="checkbox"/> Check this box if this Funding Request is covered under a master contract (a contract negotiated by a third party, the terms and conditions of which are then made available to an eligible entity that purchases directly from the service provider). <b>15d</b> <input type="checkbox"/> Check this box if this Funding Request is a continuation of an FRN from a previous funding year based on a multi-year contract. If so, provide that FRN here:																			
<b>16a Billing Account Number</b> (e.g., billed telephone number)  <b>16b</b> <input type="checkbox"/> Check this box if there are multiple Billing Account Numbers and attach a complete list of those numbers to this page.																			
<b>17 Allowable Vendor Selection/Contract Date (mm/dd/yyyy)</b> <b>(based on Form 470 filing)</b>  12/04/2013																			
<b>18 Contract Award Date (mm/dd/yyyy)</b> 01/22/2014																			
<b>19 Service Start Date (mm/dd/yyyy)</b> 07/01/2014																			
<b>20a Service End Date (mm/dd/yyyy)</b>  <b>Contract Expiration Date</b> <b>20b</b> (mm/dd/yyyy) 06/30/2019																			
<b>21 Description of This Service:</b> <b>NOTE: All Item 21 Attachments must be filed before the close of the filing window.</b> <b>Attachment</b> You MUST attach a description of the service, including a breakdown of components, costs, manufacturer name, make and model number. You must include any additional account or telephone numbers if the billed account has multiple numbers. Label the description with an Attachment Number, and note number in space provided.      6																			
<b>22 Entity/Entities Receiving This Service:</b>		a. If the service is site-specific (provided to one site and not shared by others), list the Entity Number of the entity from Block 4 receiving this service:      85169  b. If the service is shared by all entities on a Block 4 worksheet, list the worksheet number (e.g., 1):																	



Entity Number: 140323	Applicant's Form Identifier: GROVE Y17
Contact Person: Chris Webber or Karla Hall	Contact Phone Number: (918) 445-0048

**Block 5 (Continued):**

**24 Description of Broadband and other Connectivity Services Ordered for Schools and Libraries from this funding request**

☐

Complete the information below for this funding request only if requesting **Telecommunications Services** or **Internet Access** for the purpose of providing broadband and other types of connectivity to school and/or library facilities.

☐

Check this box if this request is for services or equipment that do **not** provide broadband or connectivity. For instance, check the box if this funding request is for internal connections, basic maintenance, or requests for services like e-mail or phone service.

**a**

Which technology(ies) and speed(s) are being provided in this Funding Request? Please list the number of lines and average download speed for the lines included in this funding request. If there are multiple download speeds for the lines within one type of broadband connection, this form provides two additional lines per broadband connection category. If you need additional space, please make copies of this page and number the completed pages to assure that they are all processed correctly. A response to this item is not a substitute for a complete response to Item 21 but should be consistent with the description of services in the response to Item 21. Please ask your service provider if you need assistance.

Type of Connection	Number of lines included in this FRN	Download speed per line in Mbps
Fiber optic/OC-x	1	50

**b**

If the Internet service is available to students or patrons in more than just a single location or office, please indicate:

1.

If the access is provided by wired connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to wired drops? 100 %

2.

If the access is provided by Wi-Fi connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to a Wi-Fi signal? 100 %

**c**

For consortia and statewide applications, do the connections in this FRN include the last mile connection to the school or library? ☐ Yes ☐ No  
If **no** above, are these connections only for backbone connections? ☐ Yes ☐ No

<b>Entity Number:</b> 140323		<b>Applicant's Form Identifier:</b> GROVE Y17																												
<b>Contact Person:</b> Chris Webber or Karla Hall		<b>Contact Phone Number:</b> (918) 445-0048																												
<b>Block 5: Discount Funding Request(s)</b> <b>Instructions:</b> Use one Block 5 page for EACH service (Funding Request Number) for which you are requesting discounts. Make as many copies of this page as needed, and number the completed pages to assure that they are all processed correctly.		<b>Block 5, page 5 of 6</b>  FRN 2586892 (to be assigned by administrator)																												
<b>10</b> <input type="checkbox"/> If this is a duplicate Funding Request (e.g., of an FRN that is not yet approved, under appeal, etc.), check this box and enter the original FRN in the space provided:																														
<b>11 Category of Service</b> ( only ONE category should be checked) <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <b>PRIORITY 1</b>  <input type="checkbox"/> Telecommunications Service  <input checked="" type="checkbox"/> Internet Access         </td> <td style="width: 50%; vertical-align: top;"> <b>PRIORITY 2</b>  <input type="checkbox"/> Internal Connections Other than Basic Maintenance  <input type="checkbox"/> Basic Maintenance of Internal Connections         </td> </tr> </table>		<b>PRIORITY 1</b> <input type="checkbox"/> Telecommunications Service <input checked="" type="checkbox"/> Internet Access	<b>PRIORITY 2</b> <input type="checkbox"/> Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections	<b>23 Calculations</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td rowspan="5" style="width: 10%; text-align: center; vertical-align: middle;">Recurring Charges</td> <td style="width: 10%;"><b>A.</b> Monthly charges (total amount per month for service)</td> <td style="width: 80%;">\$0.00</td> </tr> <tr> <td><b>B.</b> How much of the amount in A is ineligible?</td> <td>\$0.00</td> </tr> <tr> <td><b>C.</b> Eligible monthly pre-discount amount (A minus B)</td> <td>\$0.00</td> </tr> <tr> <td><b>D.</b> Number of months service provided in funding year</td> <td>12</td> </tr> <tr> <td><b>E.</b> Annual pre-discount amount for eligible recurring charges (C x D)</td> <td>\$0.00</td> </tr> <tr> <td rowspan="4" style="text-align: center; vertical-align: middle;">Non-Recurring Charges</td> <td><b>F.</b> Annual non-recurring charges</td> <td>\$1,920.00</td> </tr> <tr> <td><b>G.</b> How much of the amount in F is ineligible?</td> <td>\$0.00</td> </tr> <tr> <td><b>H.</b> Annual eligible pre-discount amount for non-recurring charges (F minus G)</td> <td>\$1,920.00</td> </tr> <tr> <td><b>I.</b> Total funding year pre-discount amount (E + H)</td> <td>\$1,920.00</td> </tr> <tr> <td rowspan="2" style="text-align: center; vertical-align: middle;">Total Charges</td> <td><b>J.</b> Discount from Block 4 Worksheet</td> <td>50.00</td> </tr> <tr> <td><b>K.</b> Funding Commitment Request (I x J)</td> <td>\$960.00</td> </tr> </table>		Recurring Charges	<b>A.</b> Monthly charges (total amount per month for service)	\$0.00	<b>B.</b> How much of the amount in A is ineligible?	\$0.00	<b>C.</b> Eligible monthly pre-discount amount (A minus B)	\$0.00	<b>D.</b> Number of months service provided in funding year	12	<b>E.</b> Annual pre-discount amount for eligible recurring charges (C x D)	\$0.00	Non-Recurring Charges	<b>F.</b> Annual non-recurring charges	\$1,920.00	<b>G.</b> How much of the amount in F is ineligible?	\$0.00	<b>H.</b> Annual eligible pre-discount amount for non-recurring charges (F minus G)	\$1,920.00	<b>I.</b> Total funding year pre-discount amount (E + H)	\$1,920.00	Total Charges	<b>J.</b> Discount from Block 4 Worksheet	50.00	<b>K.</b> Funding Commitment Request (I x J)	\$960.00
<b>PRIORITY 1</b> <input type="checkbox"/> Telecommunications Service <input checked="" type="checkbox"/> Internet Access	<b>PRIORITY 2</b> <input type="checkbox"/> Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections																													
Recurring Charges	<b>A.</b> Monthly charges (total amount per month for service)	\$0.00																												
	<b>B.</b> How much of the amount in A is ineligible?	\$0.00																												
	<b>C.</b> Eligible monthly pre-discount amount (A minus B)	\$0.00																												
	<b>D.</b> Number of months service provided in funding year	12																												
	<b>E.</b> Annual pre-discount amount for eligible recurring charges (C x D)	\$0.00																												
Non-Recurring Charges	<b>F.</b> Annual non-recurring charges	\$1,920.00																												
	<b>G.</b> How much of the amount in F is ineligible?	\$0.00																												
	<b>H.</b> Annual eligible pre-discount amount for non-recurring charges (F minus G)	\$1,920.00																												
	<b>I.</b> Total funding year pre-discount amount (E + H)	\$1,920.00																												
Total Charges	<b>J.</b> Discount from Block 4 Worksheet	50.00																												
	<b>K.</b> Funding Commitment Request (I x J)	\$960.00																												
<b>12 Form 470 Application Number</b> 248700001161457																														
<b>13 SPIN – Service Provider Identification Number</b> 143027090																														
<b>14 Service Provider Name</b>  Blue Torch Network Solutions, Inc.																														
<b>15a</b> <input type="checkbox"/> Check this box if this Funding Request is for non-contracted tariffed or month-to-month services.																														
<b>15b Contract Number</b> N/A																														
<b>15c</b> <input type="checkbox"/> Check this box if this Funding Request is covered under a master contract (a contract negotiated by a third party, the terms and conditions of which are then made available to an eligible entity that purchases directly from the service provider).																														
<b>15d</b> <input type="checkbox"/> Check this box if this Funding Request is a continuation of an FRN from a previous funding year based on a multi-year contract. If so, provide that FRN here:																														
<b>16a Billing Account Number</b> (e.g., billed telephone number)																														
<b>16b</b> <input type="checkbox"/> Check this box if there are multiple Billing Account Numbers and attach a complete list of those numbers to this page.																														
<b>17 Allowable Vendor Selection/Contract Date (mm/dd/yyyy)</b> (based on Form 470 filing) 12/04/2013																														
<b>18 Contract Award Date (mm/dd/yyyy)</b> 01/22/2014																														
<b>19 Service Start Date (mm/dd/yyyy)</b> 07/01/2014																														
<b>20a Service End Date (mm/dd/yyyy)</b>																														
<b>20b Contract Expiration Date</b> (mm/dd/yyyy) 06/30/2015																														
<b>21 Description of This Service:</b> NOTE: All Item 21 Attachments must be filed before the close of the filing window. Attachment You MUST attach a description of the service, including a breakdown of components, costs, manufacturer name, make and model number. You must include any additional account or telephone numbers if the billed account has multiple numbers. Label the description with an Attachment Number, and note number in space provided. <div style="text-align: right;">4</div>																														
<b>22 Entity/Entities Receiving This Service:</b>		a. If the service is site-specific (provided to one site and not shared by others), list the Entity Number of the entity from Block 4 receiving this service: 85169  b. If the service is shared by all entities on a Block 4 worksheet, list the worksheet number (e.g., 1):																												

Entity Number: 140323	Applicant's Form Identifier: GROVE Y17
Contact Person: Chris Webber or Karla Hall	Contact Phone Number: (918) 445-0048

**Block 5 (Continued):**

**24 Description of Broadband and other Connectivity Services Ordered for Schools and Libraries from this funding request**

☐ Complete the information below for this funding request only if requesting **Telecommunications Services** or **Internet Access** for the purpose of providing broadband and other types of connectivity to school and/or library facilities.

☒ Check this box if this request is for services or equipment that do **not** provide broadband or connectivity. For instance, check the box if this funding request is for internal connections, basic maintenance, or requests for services like e-mail or phone service.

**a** Which technology(ies) and speed(s) are being provided in this Funding Request? Please list the number of lines and average download speed for the lines included in this funding request. If there are multiple download speeds for the lines within one type of broadband connection, this form provides two additional lines per broadband connection category. If you need additional space, please make copies of this page and number the completed pages to assure that they are all processed correctly. A response to this item is not a substitute for a complete response to Item 21 but should be consistent with the description of services in the response to Item 21. Please ask your service provider if you need assistance.

Type of Connection	Number of lines included in this FRN	Download speed per line in Mbps

**b** If the Internet service is available to students or patrons in more than just a single location or office, please indicate:

1.	If the access is provided by wired connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to wired drops? ____%
2.	If the access is provided by Wi-Fi connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to a Wi-Fi signal? ____%

**c** For consortia and statewide applications, do the connections in this FRN include the last mile connection to the school or library? ☐ Yes ☐ No  
 If no above, are these connections only for backbone connections? ☐ Yes ☐ No

<b>Entity Number:</b> 140323		<b>Applicant's Form Identifier:</b> GROVE Y17																																							
<b>Contact Person:</b> Chris Webber or Karla Hall		<b>Contact Phone Number:</b> (918) 445-0048																																							
<b>Block 5: Discount Funding Request(s)</b> <b>Instructions:</b> Use one Block 5 page for EACH service (Funding Request Number) for which you are requesting discounts. Make as many copies of this page as needed, and number the completed pages to assure that they are all processed correctly.		<b>Block 5, page 6 of 6</b>  FRN 2586896 (to be assigned by administrator)																																							
<b>10</b> <input type="checkbox"/> If this is a duplicate Funding Request (e.g., of an FRN that is not yet approved, under appeal, etc.), check this box and enter the original FRN in the space provided:																																									
<b>11 Category of Service</b> ( only ONE category should be checked) <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <b>PRIORITY 1</b>  <input type="checkbox"/> Telecommunications Service  <input checked="" type="checkbox"/> Internet Access         </td> <td style="width: 50%; vertical-align: top;"> <b>PRIORITY 2</b>  <input type="checkbox"/> Internal Connections Other than Basic Maintenance  <input type="checkbox"/> Basic Maintenance of Internal Connections         </td> </tr> </table>		<b>PRIORITY 1</b> <input type="checkbox"/> Telecommunications Service <input checked="" type="checkbox"/> Internet Access	<b>PRIORITY 2</b> <input type="checkbox"/> Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections	<b>23 Calculations</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td rowspan="5" style="width: 10%; text-align: center; vertical-align: middle;">Recurring Charges</td> <td style="width: 10%;"><b>A.</b></td> <td>Monthly charges (total amount per month for service)</td> <td>\$2,161.00</td> </tr> <tr> <td><b>B.</b></td> <td>How much of the amount in A is ineligible?</td> <td>\$0.00</td> </tr> <tr> <td><b>C.</b></td> <td>Eligible monthly pre-discount amount (A minus B)</td> <td>\$2,161.00</td> </tr> <tr> <td><b>D.</b></td> <td>Number of months service provided in funding year</td> <td>12</td> </tr> <tr> <td><b>E.</b></td> <td>Annual pre-discount amount for eligible recurring charges (C x D)</td> <td>\$25,932.00</td> </tr> <tr> <td rowspan="3" style="text-align: center; vertical-align: middle;">Non-Recurring Charges</td> <td><b>F.</b></td> <td>Annual non-recurring charges</td> <td>\$0.00</td> </tr> <tr> <td><b>G.</b></td> <td>How much of the amount in F is ineligible?</td> <td>\$0.00</td> </tr> <tr> <td><b>H.</b></td> <td>Annual eligible pre-discount amount for non-recurring charges (F minus G)</td> <td>\$0.00</td> </tr> <tr> <td rowspan="3" style="text-align: center; vertical-align: middle;">Total Charges</td> <td><b>I.</b></td> <td>Total funding year pre-discount amount (E + H)</td> <td>\$25,932.00</td> </tr> <tr> <td><b>J.</b></td> <td>Discount from Block 4 Worksheet</td> <td>50.00</td> </tr> <tr> <td><b>K.</b></td> <td>Funding Commitment Request (I x J)</td> <td>\$12,966.00</td> </tr> </table>		Recurring Charges	<b>A.</b>	Monthly charges (total amount per month for service)	\$2,161.00	<b>B.</b>	How much of the amount in A is ineligible?	\$0.00	<b>C.</b>	Eligible monthly pre-discount amount (A minus B)	\$2,161.00	<b>D.</b>	Number of months service provided in funding year	12	<b>E.</b>	Annual pre-discount amount for eligible recurring charges (C x D)	\$25,932.00	Non-Recurring Charges	<b>F.</b>	Annual non-recurring charges	\$0.00	<b>G.</b>	How much of the amount in F is ineligible?	\$0.00	<b>H.</b>	Annual eligible pre-discount amount for non-recurring charges (F minus G)	\$0.00	Total Charges	<b>I.</b>	Total funding year pre-discount amount (E + H)	\$25,932.00	<b>J.</b>	Discount from Block 4 Worksheet	50.00	<b>K.</b>	Funding Commitment Request (I x J)	\$12,966.00
<b>PRIORITY 1</b> <input type="checkbox"/> Telecommunications Service <input checked="" type="checkbox"/> Internet Access	<b>PRIORITY 2</b> <input type="checkbox"/> Internal Connections Other than Basic Maintenance <input type="checkbox"/> Basic Maintenance of Internal Connections																																								
Recurring Charges	<b>A.</b>	Monthly charges (total amount per month for service)	\$2,161.00																																						
	<b>B.</b>	How much of the amount in A is ineligible?	\$0.00																																						
	<b>C.</b>	Eligible monthly pre-discount amount (A minus B)	\$2,161.00																																						
	<b>D.</b>	Number of months service provided in funding year	12																																						
	<b>E.</b>	Annual pre-discount amount for eligible recurring charges (C x D)	\$25,932.00																																						
Non-Recurring Charges	<b>F.</b>	Annual non-recurring charges	\$0.00																																						
	<b>G.</b>	How much of the amount in F is ineligible?	\$0.00																																						
	<b>H.</b>	Annual eligible pre-discount amount for non-recurring charges (F minus G)	\$0.00																																						
Total Charges	<b>I.</b>	Total funding year pre-discount amount (E + H)	\$25,932.00																																						
	<b>J.</b>	Discount from Block 4 Worksheet	50.00																																						
	<b>K.</b>	Funding Commitment Request (I x J)	\$12,966.00																																						
<b>12 Form 470 Application Number</b> 117400001048532																																									
<b>13 SPIN – Service Provider Identification Number</b> 143000093																																									
<b>14 Service Provider Name</b>  XO Communication Services LLC																																									
<b>15a</b> <input type="checkbox"/> Check this box if this Funding Request is for non-contracted tariffed or month-to-month services.																																									
<b>15b Contract Number</b>  N/A																																									
<b>15c</b> <input type="checkbox"/> Check this box if this Funding Request is covered under a master contract (a contract negotiated by a third party, the terms and conditions of which are then made available to an eligible entity that purchases directly from the service provider). <b>15d</b> <input checked="" type="checkbox"/> Check this box if this Funding Request is a continuation of an FRN from a previous funding year based on a multi-year contract. If so, provide that FRN here: 2430373																																									
<b>16a Billing Account Number</b> (e.g., billed telephone number)  <b>16b</b> <input type="checkbox"/> Check this box if there are multiple Billing Account Numbers and attach a complete list of those numbers to this page.																																									
<b>17 Allowable Vendor Selection/Contract Date (mm/dd/yyyy)</b> (based on Form 470 filing)  11/05/2012																																									
<b>18 Contract Award Date (mm/dd/yyyy)</b> 01/31/2013																																									
<b>19 Service Start Date (mm/dd/yyyy)</b> 07/01/2014																																									
<b>20a Service End Date (mm/dd/yyyy)</b>																																									
<b>20b Contract Expiration Date</b> (mm/dd/yyyy) 06/30/2016																																									
<b>21 Description of This Service: NOTE: All Item 21 Attachments must be filed before the close of the filing window.</b> <span style="float: right;"><b>Attachment</b></span> You MUST attach a description of the service, including a breakdown of components, costs, manufacturer name, make and model number. You must include any additional account or telephone numbers if the billed account has multiple numbers. Label the description with an Attachment Number, and note number in space provided. <span style="float: right;">5</span>																																									
<b>22 Entity/Entities Receiving This Service:</b>		a. If the service is site-specific (provided to one site and not shared by others), list the Entity Number of the entity from Block 4 receiving this service: 85169  b. If the service is shared by all entities on a Block 4 worksheet, list the worksheet number (e.g., 1):																																							

Entity Number: 140323	Applicant's Form Identifier: GROVE Y17
Contact Person: Chris Webber or Karla Hall	Contact Phone Number: (918) 445-0048

**Block 5 (Continued):**

**24 Description of Broadband and other Connectivity Services Ordered for Schools and Libraries from this funding request**

☐

Complete the information below for this funding request only if requesting **Telecommunications Services** or **Internet Access** for the purpose of providing broadband and other types of connectivity to school and/or library facilities.

☐

Check this box if this request is for services or equipment that do **not** provide broadband or connectivity. For instance, check the box if this funding request is for internal connections, basic maintenance, or requests for services like e-mail or phone service.

**a**

Which technology(ies) and speed(s) are being provided in this Funding Request? Please list the number of lines and average download speed for the lines included in this funding request. If there are multiple download speeds for the lines within one type of broadband connection, this form provides two additional lines per broadband connection category. If you need additional space, please make copies of this page and number the completed pages to assure that they are all processed correctly. A response to this item is not a substitute for a complete response to Item 21 but should be consistent with the description of services in the response to Item 21. Please ask your service provider if you need assistance.

Type of Connection	Number of lines included in this FRN	Download speed per line in Mbps
Fiber optic/OC-x	1	10

**b**

If the Internet service is available to students or patrons in more than just a single location or office, please indicate:

1.

If the access is provided by wired connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to wired drops? 100 %

2.

If the access is provided by Wi-Fi connections, approximately what percentage of the school classroom or public library rooms included in the Block 4 worksheet for this FRN will have access to a Wi-Fi signal? 100 %

**c**

For consortia and statewide applications, do the connections in this FRN include the last mile connection to the school or library? ☐ Yes ☐ No  
If **no** above, are these connections only for backbone connections? ☐ Yes ☐ No

<b>Entity Number:</b> 140323	<b>Applicant's Form Identifier:</b> GROVE Y17
<b>Contact Person:</b> Chris Webber or Karla Hall	<b>Contact Phone Number:</b> (918) 445-0048

**Block 6: Certifications and Signature**

**25** ☒ I certify that the entities listed in Block 4 of this application are eligible for support because they are: (Check one or both.)

**a** ☒ schools under the statutory definitions of elementary and secondary schools found in the **No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38)**, that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or  
**b** ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools, including, but not limited to, elementary, secondary schools, colleges, or universities.

**26** ☒ I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

<b>a</b> Total funding year pre-discount amount on this Form 471 (Add the entries from Items 23I on all Block 5 Discount Funding Requests.)	81973.28
<b>b</b> Total funding commitment request amount on this Form 471 (Add the entries from Items 23K on all Block 5 Discount Funding Requests.)	40986.64
<b>c</b> Total applicant non-discount share (Subtract Item 26b from Item 26a.)	40986.64
<b>d</b> Total budgeted amount allocated to resources not eligible for E-rate support	128237
<b>e</b> Total amount necessary for the applicant to pay the non-discount share of the services requested on this application AND to secure access to the resources necessary to make effective use of the discounts. (Add Items 26c and 26d.)	169223.64
<b>f</b> <input type="checkbox"/> Check this box if you are receiving any of the funds in Item 26e directly from a service provider listed on any of the Forms 471 filed by this Billed Entity for this funding year, or if a service provider listed on any of the Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds in Item 26e.	

**27** ☐ I certify that, if required by Commission rules, all of the individual schools and libraries receiving services under this form are covered by technology plans that do or will cover all 12 months of the funding year, and that have been or will be approved by a state or other authorized body or an SLD-certified technology plan approver prior to the commencement of service.

Or ☒ I certify that no technology plan is required by Commission rules.

**28** ☒ I certify that (if applicable) I posted my Form 470 and (if applicable) made any related RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology plan goals.

**29** ☒ I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

**30** ☒ I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. §§ 54.500, 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

**31** ☒ I certify that I and the entity(ies) I represent have complied with all program rules, including recordkeeping requirements, and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts covering all of the services listed on this Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

<b>Entity Number:</b> 140323		<b>Applicant's Form Identifier:</b> GROVE Y17	
<b>Contact Person:</b> Chris Webber or Karla Hall		<b>Contact Phone Number:</b> (918) 445-0048	

**Block 6: Certification and Signature (Continued)**

32 ☒ I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

33 ☒ I certify that I will retain required documents for a period of at least five years (or whatever retention period is required by the rules in effect at the time of this certification) after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

34 ☒ I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

35 ☒ I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

36 ☒ I certify that if any of the Funding Requests on this Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504(g)(1), (2).

37 ☒ I certify that this funding request does not constitute a request for internal connections services, except basic maintenance services, in violation of the Commission requirement that eligible entities are not eligible for such support more than twice every five funding years as required by the Commission's rules at 47 C.F.R. § 54.506(c).

38 ☒ I certify that the non-discount portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services featured on this Form 471 are net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of this rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

39 Signature of authorized person <input checked="" type="checkbox"/>	40 Date 02/24/2014
---	--------------------

41 Printed name of authorized person Chris Webber

42 Title or position of authorized person Consultant

☐ Check here if the consultant in Item 6g is the Authorized Person.

43a Street Address, P.O. Box, or Route Number  
PO Box 701713

City Tulsa  
State OK Zip Code 74170-1713

<b>Entity Number: 140323</b>		<b>Applicant's Form Identifier: GROVE Y17</b>	
<b>Contact Person: Chris Webber or Karla Hall</b>		<b>Contact Phone Number: (918) 445-0048</b>	
<b>43b</b>	Telephone Number of authorized Person	(918) 445-0048	Ext.
<b>43c</b>	Fax Number of Authorized Person	(918) 445-0049	
<b>43d</b>	E-mail Address of authorized Person	info@crwconsulting.com	
	Re-enter E-mail Address	info@crwconsulting.com	
<b>43e</b>	Name of Authorized Person's Employer	CRW Consulting	
<p><b>NOTICE:</b> Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504(c). The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.</p> <p>An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.</p> <p>The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public.</p> <p>If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.</p> <p>If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.</p> <p>The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.</p> <p>Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.</p> <p><b>Please submit this form to:</b> SLD-Form 471 P.O. Box 7026 Lawrence, Kansas 66044-7026</p> <p><b>For express delivery services or U.S. Postal Service, Return Receipt Requested, mail this form to:</b> SLD Forms ATTN: SLD Form 471 3833 Greenway Drive Lawrence, Kansas 66046 (888) 203-8100</p>			
FCC Form 471 - December 2013			

[Close Print Preview](#)[Previous](#)



**Exhibit 4:** Notification of Commitment Adjustment Letter



Notification of Commitment Adjustment Letter

Funding Year 2014: July 1, 2014 - June 30, 2015

May 20, 2016

Chris Webber or Karla Hall  
GROVE SCHOOL CO DISTRICT 27  
PO Box 701713  
Tulsa, OK 74170 1713

Re: Form 471 Application Number:	951256
Funding Year:	2014
Applicant's Form Identifier:	GROVE Y17
Billed Entity Number:	140323
FCC Registration Number:	0012038089
SPIN:	143035519
Service Provider Name:	Meet Point Networks LLC
Service Provider Contact Person:	Beverley Fielding

Our routine review of Schools and Libraries Program (SLP) funding commitments has revealed certain applications where funds were committed in violation of SLP rules.

In order to be sure that no funds are used in violation of SLP rules, the Universal Service Administrative Company (USAC) must now adjust your overall funding commitment. The purpose of this letter is to make the required adjustments to your funding commitment, and to give you an opportunity to appeal this decision. USAC has determined the applicant is responsible for all or some of the violations. Therefore, the applicant is responsible to repay all or some of the funds disbursed in error (if any).

This is NOT a bill. If recovery of disbursed funds is required, the next step in the recovery process is for USAC to issue you a Demand Payment Letter. The balance of the debt will be due within 30 days of that letter. Failure to pay the debt within 30 days from the date of the Demand Payment Letter could result in interest, late payment fees, administrative charges and implementation of the "Red Light Rule." The FCC's Red Light Rule requires USAC to dismiss pending FCC Form 471 applications if the entity responsible for paying the outstanding debt has not paid the debt, or otherwise made satisfactory arrangements to pay the debt within 30 days of the notice provided by USAC. For more information on the Red Light Rule, please see <https://www.fcc.gov/encyclopedia/red-light-frequently-asked-questions>.

TO APPEAL THIS DECISION:

If you wish to appeal the Commitment Adjustment Decision indicated in this letter to USAC, your appeal must be received or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify the date of the Notification of Commitment Adjustment Letter and the Funding Request Number(s) (FRNs) you are appealing. Your letter of appeal must include the
  - Billed Entity Name,
  - Form 471 Application Number,
  - Billed Entity Number, and
  - FCC Registration Number (FCC RN) from the top of your letter.
3. When explaining your appeal, copy the language or text from the Notification of Commitment Adjustment Letter that is the subject of your appeal to allow USAC to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal including any correspondence and documentation.
4. If you are an applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are a service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to [appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org) or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to us by fax, fax your appeal to (973) 599-6542.

To submit your appeal to us on paper, send your appeal to:

Letter of Appeal  
Schools and Libraries Program - Correspondence Unit  
30 Lanidex Plaza West  
PO Box 685  
Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, see "Appeals" in the "Schools and Libraries" section of the USAC website.

## FUNDING COMMITMENT ADJUSTMENT REPORT

On the pages following this letter, we have provided a Funding Commitment Adjustment Report (Report) for the Form 471 application cited above. The enclosed Report includes the Funding Request Number(s) from your application for which adjustments are necessary. See the "Guide to USAC Letters" posted at <http://www.usac.org/sl/tools/samples.aspx> for more information on each of the fields in the Report. USAC is also sending this information to your service provider(s) for informational purposes. If USAC has determined the service provider is also responsible for any rule violation on the FRN(s), a separate letter will be sent to the service provider detailing the necessary service provider action.

Note that if the Funds Disbursed to Date amount is less than the Adjusted Funding Commitment amount, USAC will continue to process properly filed invoices up to the Adjusted Funding Commitment amount. Review the Funding Commitment Adjustment Explanation in the attached Report for an explanation of the reduction to the commitment(s). Please ensure that any invoices that you or your service provider(s) submits to USAC are consistent with SLP rules as indicated in the Funding Commitment Adjustment Explanation. If the Funds Disbursed to Date amount exceeds your Adjusted Funding Commitment amount, USAC will have to recover some or all of the disbursed funds. The Report explains the exact amount (if any) the applicant is responsible for repaying.

Schools and Libraries Program  
Universal Services Administrative Company

cc: Beverley Fielding  
Meet Point Networks LLC

**Funding Commitment Adjustment Report for  
Form 471 Application Number: 951256**

Funding Request Number: 2586885  
Services Ordered: INTERNET ACCESS  
SPIN: 143035519  
Service Provider Name: Meet Point Networks LLC  
Contract Number: N/A  
Billing Account Number:  
Site Identifier: 140323  
Original Funding Commitment: \$25,045.00  
Commitment Adjustment Amount: \$25,045.00  
Adjusted Funding Commitment: \$0.00  
Funds Disbursed to Date \$0.00  
Funds to be Recovered from Applicant: \$0.00  
Funding Commitment Adjustment Explanation:

After a thorough investigation, it has been determined that this funding commitment must be rescinded in full. Based on the documentation you provided during the Special Compliance Review, FRN 2586885 will be denied because you did not select the most cost-effective bid proposal. FCC rules state that in selecting a provider of eligible services, applicants must carefully consider all bids submitted and must select the most cost-effective service offering. In determining which service offering is the most cost-effective, entities may consider relevant factors other than the pre-discount prices submitted by providers, but price should be the primary factor considered. The FCC further codified in the Ysleta Order that In evaluating bids from prospective service providers, applicants must select the most cost-effective offering from the bids received. The selected bid must itself be cost-effective compared to prices available commercially and stated that there may be situations where the price of services is so exorbitant that it cannot, on its face, be cost-effective. For instance, a proposal to sell at prices two to three times greater than the prices available from commercial vendors would not be cost-effective, absent extenuating circumstances. You posted requests for minimum 10 MBPS, applicant is considering upgrading to 20 MBPS on FCC Form 470# 248700001161457 and the associated RFP. You received a bid from ATT offering these specific services at an amount of \$979.60 per month for 20 MBPS, a bid from Meetpoint for \$2,877.50 for 20 MBPS, a bid from One Net for \$1,143 per month for 20 MBPS and a bid from XO Communications for \$5,462.30 for 44 MB. All bids are for the specific services requested on the Form 470. You selected a bid from Meetpoint for an amount of \$4,132.50 monthly for 50 MBPS. The bid chosen is over three times more costly than the bid offering from ATT and One Net. This violates the FCC requirement that applicants select the most cost-effective offering from the bids received absent extenuating circumstances. During the review you did not present extenuating circumstances which mitigates your choice of a bid over two to three times greater than the price available from another commercial vendor. Therefore, the commitment has been rescinded in full.

**Exhibit 5: Administrator's Decision Letter**



Universal Service Administrative Company  
Schools & Libraries Division

---

Administrator's Decision on Appeal – Funding Year 2014-2015

August 05, 2016

Chris Webber  
Grove School Co Dist 27  
CRW Consulting, LLC  
PO Box 701713  
Tulsa, OK 74170-1713

Re: Applicant Name: GROVE SCHOOL CO DISTRICT 27  
Billed Entity Number: 140323  
Form 471 Application Number: 951256  
Funding Request Number(s): 2586885  
Your Correspondence Dated: July 16, 2016

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2014 Notification of Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2586885  
Decision on Appeal: **Denied**  
Explanation:

- During the appeal review of your FCC Form 471# 951256 you requested reversal of the COMAD decision to seek recovery of improperly disbursed funds. It has been determined that this funding commitment must be rescinded in full. Based on the documentation you provided during the Special Compliance Review, FRN 2586885 will be denied because you did not select the most cost-effective bid proposal. FCC rules state that in selecting a provider of eligible services, applicants must carefully consider all bids submitted and must select the most cost-effective service offering. In determining which service offering is the most cost-effective, entities may consider relevant factors other than the pre-discount prices submitted by providers, but price should be the primary factor considered. The FCC further codified in the Ysleta Order that In evaluating bids from

prospective service providers, applicants must select the most cost-effective offering from the bids received. The selected bid must itself be cost-effective compared to prices available commercially and stated that there may be situations where the price of services is so exorbitant that it cannot, on its face, be cost-effective. For instance, a proposal to sell at prices two to three times greater than the prices available from commercial vendors would not be cost-effective, absent extenuating circumstances. You posted requests for minimum 10 MBPS, applicant is considering upgrading to 20 MBPS on FCC Form 470# 248700001161457 and the associated RFP. You received a bid from ATT offering these specific services at an amount of \$979.60 per month for 20 MBPS, a bid from Meetpoint for \$2,877.50 for 20 MBPS, a bid from One Net for \$1,143 per month for 20 MBPS and a bid from XO Communications for \$5,462.30 for 44 MB. All bids are for the specific services requested on the Form 470. You selected a bid from Meetpoint for an amount of \$4,132.50 monthly for 50 MBPS. The bid chosen is over three times more costly than the bid offering from ATT and One Net. This violates the FCC requirement that applicants select the most cost-effective offering from the bids received absent extenuating circumstances. During the review you did not present extenuating circumstances which mitigates your choice of a bid over two to three times greater than the price available from another commercial vendor. In your appeal, you did not demonstrate that USAC's determination was incorrect. Therefore, the commitment has been rescinded in full. Consequently, your appeal is denied.

- FCC rules state that, in selecting a service provider, the applicant must carefully consider all bids submitted and must select the most cost-effective service or equipment offering, with price being the primary factor, which will result in being the most cost-effective means of meeting educational needs and the technology plan goals. *See* 47 C.F.R. secs. 54.511(a), 54.503(c)(2)(vii), 54.504(a)(1)(xi). *See* also Request for Review of the Decision of the Universal Service Administrator by Ysleta Independent School District, El Paso, Texas, et al., Federal-State Joint Board of Universal Service, Changes to the Board of Directors of the National Exchange Carrier Association, Inc., SLD Nos. 321479, et al., CC Docket Nos. 96-45 and 97-21, Order, 18 FCC Rcd 26407, FCC 03-313 paras. 47-55 (Dec. 8, 2003). Service providers shall not charge the entities a price above the lowest corresponding price. *See* 47 C.F.R. sec. 54.511(b). In order to ensure that applicants are not requesting discounts for services beyond their reasonable needs, USAC denies funding request(s) for not being cost-effective. The costs of the products and services in a funding request should not be significantly higher than the costs generally available in the applicant's marketplace for the same or similar products or services. For example, equipment at prices two or three times greater than the prices available from commercial vendors would not be cost effective, unless there were extenuating circumstances. *See* Ysleta Order para. 54.

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options



for filing an appeal directly with the FCC ~~can be found~~ under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

## **Exhibit 6: Bid Evaluations Sheets**

**BID EVALUATION SHEET – Short  
Erate Year 2014**

1. Service that is being evaluated: Internet Access  
*Examples include: Internet access, local phone service, long distance service, cell phone service, wireless data plan service, WAN connectivity*
  2. Company that has submitted bid: MeerPoint
  3. Service level from the bid that is being evaluated: per MB  
*Examples include: Internet access – 200 mb, local phone – 50 lines, cell phones – unlimited pooled minutes, wireless data plans – 500 Mb, WAN Connectivity – (5) 1 Gb circuits. You may have to determine per-unit pricing (cost per Mb, for example) to compare bids submitted from different companies at different service levels.*
  4. Price that is being evaluated: 82.65
- POINTS MUST BE AWARDED IN ALL CATEGORIES. DO NOT WRITE “N/A” IN ANY CATEGORY.
  - DO NOT GIVE EQUAL POINTS FOR PRICE TO TWO VENDORS UNLESS THEY BID THE EXACT SAME SERVICE FOR THE EXACT SAME PRICE

Evaluation Factor	Maximum Points	Total Awarded Points
PRICE OF ELIGIBLE GOODS AND SERVICES	40	35
SERVICE HISTORY	20	20
TOTAL POINTS	60	55

Bid Evaluated by (one person per sheet): Rusey Carmichael

Date: 1-6-2014

Signature: Rusey Carmichael

**BID EVALUATION SHEET – Short  
Erate Year 2014**

1. **Service that is being evaluated:** Internet Access  
*Examples include: Internet access, local phone service, long distance service, cell phone service, wireless data plan service, WAN connectivity*
2. **Company that has submitted bid:** XO Communications
3. **Service level from the bid that is being evaluated:** per MB  
*Examples include: Internet access – 200 mb, local phone – 50 lines, cell phones – unlimited pooled minutes, wireless data plans – 500 Mb, WAN Connectivity – (5) 1 Gb circuits. You may have to determine per-unit pricing (cost per Mb, for example) to compare bids submitted from different companies at different service levels.*
4. **Price that is being evaluated:** 124.14

- POINTS MUST BE AWARDED IN ALL CATEGORIES. DO NOT WRITE “N/A” IN ANY CATEGORY.
- DO NOT GIVE EQUAL POINTS FOR PRICE TO TWO VENDORS UNLESS THEY BID THE EXACT SAME SERVICE FOR THE EXACT SAME PRICE

Evaluation Factor	Maximum Points	Total Awarded Points
PRICE OF ELIGIBLE GOODS AND SERVICES	40	25
SERVICE HISTORY	20	20
<b>TOTAL POINTS</b>	60	45

Bid Evaluated by (one person per sheet): Russell Carmichael

Date: 1-6-2014

Signature: Russell Carmichael

**BID EVALUATION SHEET – Short  
Erate Year 2014**

1. Service that is being evaluated: Internet Access  
Examples include: Internet access, local phone service, long distance service, cell phone service, wireless data plan service, WAN connectivity
2. Company that has submitted bid: One Net
3. Service level from the bid that is being evaluated: per MB  
Examples include: Internet access – 200 mb, local phone – 50 lines, cell phones – unlimited pooled minutes, wireless data plans – 500 Mb, WAN Connectivity – (5) 1 Gb circuits. You may have to determine per-unit pricing (cost per Mb, for example) to compare bids submitted from different companies at different service levels.
4. Price that is being evaluated: 61.<sup>60</sup>

- POINTS MUST BE AWARDED IN ALL CATEGORIES. DO NOT WRITE “N/A” IN ANY CATEGORY.
- DO NOT GIVE EQUAL POINTS FOR PRICE TO TWO VENDORS UNLESS THEY BID THE EXACT SAME SERVICE FOR THE EXACT SAME PRICE

Evaluation Factor	Maximum Points	Total Awarded Points
PRICE OF ELIGIBLE GOODS AND SERVICES	40	40
SERVICE HISTORY	20	0
TOTAL POINTS	60	40

Bid Evaluated by (one person per sheet): Rusey Carmichael

Date: 1-6-2014

Signature: Rusey Carmichael

**BID EVALUATION SHEET – Short  
Erate Year 2014**

1. Service that is being evaluated: Internet Access  
Examples include: Internet access, local phone service, long distance service, cell phone service, wireless data plan service, WAN connectivity
2. Company that has submitted bid: AT&T
3. Service level from the bid that is being evaluated: per MB  
Examples include: Internet access – 200 mb, local phone – 50 lines, cell phones – unlimited pooled minutes, wireless data plans – 500 Mb, WAN Connectivity – (5) 1 Gb circuits. You may have to determine per-unit pricing (cost per Mb, for example) to compare bids submitted from different companies at different service levels.
4. Price that is being evaluated: 112.38

- POINTS MUST BE AWARDED IN ALL CATEGORIES. DO NOT WRITE "N/A" IN ANY CATEGORY.
- DO NOT GIVE EQUAL POINTS FOR PRICE TO TWO VENDORS UNLESS THEY BID THE EXACT SAME SERVICE FOR THE EXACT SAME PRICE

Evaluation Factor	Maximum Points	Total Awarded Points
PRICE OF ELIGIBLE GOODS AND SERVICES	40	30
SERVICE HISTORY	20	10
TOTAL POINTS	60	40

Bid Evaluated by (one person per sheet): Rusty Carmichael

Date: 1-6-2014

Signature: Rusty Carmichael